



Cosma Casting Michigan
10 Clark Road
Battle Creek, MI
49037
(269) 966-4900 x 1203

December 30, 2014

Mr. Rex Lane
Michigan Department of Environmental Quality
Air Quality Division
7953 Adobe Road
Kalamazoo, MI 49009-5025

Re: Cosma Casting Michigan – SRN: N8223
Letter of Violation dated 9 December 2014

Dear Mr. Lane:

This letter is in response to the Letter of Violation (LOV) issued to Cosma Casting Michigan (CCMi) on December 9, 2014. The violations listed are in reference to Rule 336.1201 (Rule 201) and Permit to Install (PTI) No. 166-13 at CCMi's facility in Battle Creek, Michigan. The LOV states that CCMi heat treated oil-coated parts in the heat treat furnaces (in addition to non-oil-coated parts), installed a larger back-up generator than what was permitted (and did not keep operating hour records for the generator) and installed rain protection caps on the furnace exhaust stacks. The LOV requests information on the cause and duration of the nonconformance and steps taken to prevent a reoccurrence. Following is CCMi's response to the information request.

The reason that CCMi was unprepared to demonstrate compliance at the time of the MDEQ inspection was primarily due to the turnover of staff at the "greenfield" start-up launch, including maintenance leadership and the HSE Coordinator, all of whom had been in their respective positions for fewer than 3 months. CCMi did retain an outside consultant, who did not specialize in Michigan air permitting requirements; therefore, interpretations were not adequate regarding the issue with the oil-coated parts.

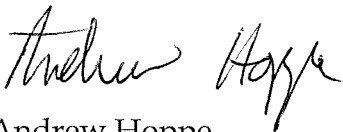
CCMi has recently contracted a local consulting company, Environmental Resources Management (ERM), to provide guidance and assistance with the response and corrections relevant to the LOV. Specific steps are being taken to identify issues (as shown in the following paragraph), and CCMi will notify the MDEQ with its final action plan by 21 January 2015. If a modification of the PTI is ultimately required, CCMi anticipates submission of the application by the middle of February 2015.

CCMi has undertaken the following steps to maintain compliance with existing permits and to prevent a reoccurrence of the findings listed in the LOV:

- 1) CCMi has consulted with ERM regarding the oil free parts requirements. CCMi will be initiating a call with the MDEQ, after the first of the year, to discuss if the heat treat furnaces can be moved to PTI Exemption Rule 290 or if the PTI will need to be modified.
- 2) CCMi has implemented a system to monitor and record the operating hours of the back-up generator and will submit a PTI application to modify the design limit.
- 3) CCMi has initiated a review of the PTI application regarding the proper rain cap design and will either request a modification to the PTI to allow for the rain caps or will redesign the rain caps to comply with the current PTI requirements.
- 4) CCMi will partner with ERM to promote awareness of applicable regulations through Air Permit and Compliance training, which will be provided for facility management and operations staff.

In closing, CCMi is working diligently to fulfill its commitment to sustainable compliance with its air permits. An Action Plan will be submitted to MDEQ by 21 January 2015. We hope that we have addressed the concerns in the LOV and look to a continued partnership with MDEQ as we move forward. If there is anything further we can provide please do not hesitate to contact me at (269) 966-4900 Ext. 1203.

Sincerely,



Andrew Hoppe
Health, Safety, and Environmental Coordinator

cc: Mr. Thomas Hess, AQD
P.O. Box 30473
Lansing, Michigan 48909-7973

Ms. Mary Douglas
Michigan Department of Environmental Quality
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Matthew Kwiatkowski, ERM