



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 14, 2020

Mr. Todd Latouf
MAGNA Cosma Casting Michigan
750 Tower Drive
Troy, Michigan 48098

SRN: N8223, Calhoun County

Dear Mr. Latouf:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a review of the Permit to Install (PTI) application submitted on June 22, 2020 and site visit on August 12, 2020 to further understand the process at the facility. The purpose of this review is to ensure a complete application is received by the permitting section with accurate facility and process information. The facility is also required to comply with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and all other applicable state and federal rules.

During the review, staff discovered the following:

Process Description	Rule/Permit Condition Violated	Comments
Melt furnace #5	Rule 336.201(1)	The facility began installation of melt furnace #5 before a decision was made, by the department, on an applied for construction waiver.
Degassing Stations	Rule 336.201(1)(b)	The facility modified the originally permitted process in PTI 166-13 using nitrogen in the degassing station, resulting in no regulated pollutants being emitted, to fluxing in the degassing station, which is emitted uncontrolled from the stack, resulting in regulated pollutants being emitted to the outside air. This change to the process was made without first obtaining a permit or modifying the existing permit.

The facility applied for a construction waiver on July 9, 2020 to begin construction on two new melt furnaces and an associated degassing station. Requested PTE calculations were received

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on Friday August 7, 2020. By law, the waiver must be approved or denied within 30 days of receipt of the waiver request. Based on information known at the time, the waiver was denied. This was due to the facility's PTE showing they are a major source of HAPs and the facility possibly being subject to 40 CFR Part 63 Subpart RRR. A construction waiver cannot be issued if the facility is a major source of HAPs and is subject to any NESHAP in 40 CFR Part 63 or Part 61.

During the on-site visit on August 13, 2020, it was noted that the #5 melting furnace had been installed at the facility. Based on observations, the furnace was in place, bolted to the floor, and a stack had been constructed through the roof. According to the facility, the furnace was on site and placed on August 4, 2020, before the waiver request was denied. This constitutes a violation of Rule 201 of the administrative rules promulgated under Act 451.

During this application review, it was noted that the process identified as degassing in the original application had been modified significantly from the process that is currently happening at the facility. This is a violation of Rule 201 of the administrative rules promulgated under Act 451.

Specifically, during the permitting process for PTI 166-13, the process for degassing was described as molten aluminum is tapped out from the furnaces and transferred to the degassing station, where nitrogen gas is used. No regulated air pollutants are emitted from the degassing process. The current practice at the facility is molten aluminum is tapped out from the furnaces and transferred to the degassing station where COVERAL GR 2531 flux is used. This results in air pollutants being emitted, uncontrolled, from the process, including Hydrogen Fluoride and Hydrochloric Acid, hazardous air pollutants (HAPs).

A program for compliance may include a completed PTI application for the existing degassing process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Based on the provided facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source as requested by the Department to process PTI 166-13D, the facility is a major source of HAPs. Steps need to be taken to obtain facility-wide HAP out-out limits or comply with the Title V, Renewable Operating Permit program and 40 CFR Part 63 Subpart RRR for secondary aluminum processing.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 2, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Cosma Casting believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Amanda Chapel
Environmental Quality Analyst
Air Quality Division
(269) 910-2109

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE
Mr. Nick Ponstein, MAGNA Cosma Casting