



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



KEITH CREAGH
DIRECTOR

July 20, 2016

Mr. Deepak Bhalla
Director of Purchasing and Facilities
Sakthi Automotive Group USA, Inc.
6401 W. Fort Street
Detroit, Michigan 48209

SRN: P0380, Wayne County

Dear Mr. Bhalla:

VIOLATION NOTICE

On Thursday, July 14, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the Sakthi Automotive Group USA (hereinafter Sakthi) facility located at 6401 West Fort Street, Detroit, Michigan. The purpose of this inspection was to determine Sakthi's compliance 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); and the AQD's administrative rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Building site of a new aluminum die-casting facility at 201 Waterman Street in Detroit.	R 336.1201(1)	Construction has commenced on an aluminum die-casting plant prior to the issuance of a Permit to Install.

During this inspection, it was noted that Sakthi had commenced construction of an aluminum die-casting plant, which is located at 201 Waterman Street in Detroit. When completed and operational, the aluminum die-casting plant will operate as part of the existing Sakthi facility at 6401 West Fort Street. I observed that the construction of the building structure that will house the aluminum die-casting plant is complete. In addition, while the aluminum furnaces have not yet been installed at the site, the installation of some of the supporting infrastructure, such as electrical and plumbing connections and quench pits, has commenced. I advised the Sakthi staff that I spoke with during my site visit that these construction activities are a violation of R 336.1201(1) (also hereafter Rule 201(1)) of the AQD's administrative rules).

Be advised that Rule 201(1) requires that a Permit to Install (PTI) be obtained prior to the installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

As you are aware, Sakthi has submitted a PTI application for the new aluminum die-casting plant; the application was received by the AQD Permit Section on June 3, 2016, and

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assigned PTI application number 92-16. Sakthi submitted additional correspondence dated June 21, 2016 that served to request a construction waiver, in accordance with Michigan Administrative Rule 202, to allow construction to commence on the site of the plant prior to AQD's final action on Sakthi's PTI application. However, construction of the new aluminum die-casting facility began before either the PTI application or the construction waiver request was approved by the AQD, or in fact before either was even submitted to the AQD for our evaluation. It is also important to note that the waiver request was denied by the AQD via a letter dated July 6, 2016.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 10, 2016 (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.

If Sakthi believes that 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 and for the cooperation that was extended to me during my inspection of the Sakthi facility. 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,



Stephen Weis
Senior Environmental Engineer
Air Quality Division
313-456-4688

cc: Mr. Raymond Scott, City of Detroit, BSEED
Ms. LaReina Wheeler, City of Detroit, BSEED
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Ms. Annette Switzer, DEQ
Mr. Mark Mitchell, DEQ
Mr. David Riddle, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ