

03-04-2022

On February 1, 2022, Bowers Aluminum Company was inspected by the Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD). The inspection was performed by Amanda Chapel, Senior Environmental Quality Analyst in the presence of Jay Peterman, Facilities Manager and Jim Busch, President, Bowers Aluminum Company.

As a result of the inspection, there were findings that led to a Notice of Violation for the following. The conditions of PTI number 159-18 require the Facility maintain records of inspections of emission units contained in FGANODIZING with the information included as follows...

...The Facility should be conducting daily inspections of the scrubber and recording the differential pressure drop, scrubber liquid flow rate, and scrubber liquid pH once daily, while in operation. These should be made available for review upon request by AQD staff.

The violation occurred on 02-01-2021. Bowers Aluminum had been conducting visual daily inspection, but not recording the information. This has been the case since the beginning of operations in July of 2019. A scrubber daily log sheet has since been developed and implemented on 03-01-2022 to record the above-mentioned items and more (see attachment). Bowers Aluminum also has since purchased the necessary equipment to monitor the scrubbers water recycle pump flow rate. The original equipment didn't have this feature. The new flow meter installation is scheduled to be completed by 03-14-2022.

These steps should satisfy the requirement and more. We feel that although we were in violation, that we were acting in a responsible manner to ensure we were operating within the guidelines of the permit. Where we lacked in our responsibility, was in the documentation of the data required and having the flow meter.

I hope that you will agree that the steps taken meets the guidelines and requirements to fulfill and maintain the safe air standard of the permit. If it does not, please let us know what other steps need to be taken to meet the requirements set forth in the permit.

Regards,

Jim Busch President

Bowers Aluminum Company 269-441-8403 Direct Line

Jan Burns

Scrubber Daily Log Sheet

Inspect the scrubber equipment for proper operation. Record the operating parametes and any comments.

		Inspected	PH	Recycle Pump	Recycle Pump	Water	Pack Differential	
Date	Time	Ву	Reading	Flow Rate GPM	Discharge PSI	Make-Up GPM	Pressure "W.C.	Comments
					*			
				317				

