



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



DAN WYANT  
DIRECTOR

January 23, 2014

John Lancaster, Plant Manager  
GM LLC Saginaw Metal Casting Operations  
1629 N. Washington Ave  
Saginaw, MI 48601

SRN: B1991, Saginaw County

Dear Mr. Lancaster:

**VIOLATION NOTICE**

On January 13, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the emission test report for the emission testing conducted at the General Motors Saginaw Metal Casting Operations (GM SMC) located at 1629 N. Washington, Saginaw, Michigan. The purpose of the emission stack tests was to determine 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); the administrative rules and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B1991-2009a.

A review of the reported emission test results found the following:

Process Description	Rule/Permit Condition Violated	Comments <sup>1</sup>
EU-6ML-GV-02 Aluminum Reverberatory Furnace #2 (East)	Flux: (R336.1331) 4.1 lbs PM-10/hr,  0.04 lbs PM -10/1000 lbs exhaust gas on a dry gas basis  (336.1201 & 1205(3)) 0.23 lbs VOC/hr  Dross (336.1201 & 1205(3)) 0.23 lbs VOC/hr	Test result during flux: 6.12 lbs PM-10/hr  0.58 lbs PM-10/1000 lbs  0.27 lbs VOC/hr  Test result during drossing: 0.32 lbs VOC/hr
EU-6ML-EF-04 #6ML mold conveyor (Basement cooling conveyor, 1st floor conveyor)	(R336.1331) 11.3 lbs PM-10/hr	Test Result: 16.11 lbs PM-10/hr
EU-6ML-DC-67 #6ML Aluminum degate (Cells #1-#5, Unit #9 secondary  scalping screen in basement) controlled by a wet collector	(R336.1331) 2.1 lbs PM -10/hr  0.01 lb PM-10/1000 lbs exhaust gas on a dry basis	Test result: 3.4 lbs PM-10/hr  0.017 lb PM-10/1000 lbs

<sup>1</sup> All PM counted as PM-10

Between November 7 and 13, 2013, stack tests were conducted which indicated that emissions from the company's processes listed in the table above exceeded the allowable emission rate specified MI-ROP-B1991-2009a for each emission unit's Special Condition I, Emission Limits.

The records provided demonstrate that actual emissions of Particulate Matter (PM) from the process equipment are those listed in the above table. The conditions of MI-ROP-B1991-2009a limit the emissions of PM to the values listed in the above table.

Additionally, the records provided demonstrate that actual emissions of Volatile Organic Compounds (VOC) from the process equipment are those listed in the above table. The conditions of MI-ROP-B1991-2009a limit the emissions of VOC to the values listed in the above table.

Between November 7 and 13, 2013, stack tests were conducted which indicated that emissions from the company's processes listed in the table above exceeded the allowable emission rate specified in Rule 331, Table 31 and MI-ROP-B1991-2009a for each emission unit's Special Condition I, Emission Limits.

This constitutes a violation of Act 451, Rule 331, which prohibits emissions of particulate matter from any process or process equipment in excess of the maximum allowable emission rate listed in Table 31 or specified as a condition of an air use permit.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 14, 2014. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If GM SMC O 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 violations cited above and for the cooperation that was extended to AQD staff during November 2013 stack emission testing. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kathy L. Brewer  
Environmental Quality Analyst  
Air Quality Division  
Saginaw Bay District Office  
(989) 894-6214

klb/ai

cc: Mr. Chris Hare, DEQ

cc/via email: Ms. Jennifer Tegan, GECS Air Support, GM  
Ms. Renee Mietz, GECS Environmental Engineer, GM  
Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Nathan Hude, DEQ