



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



DAN WYANT  
DIRECTOR

October 4, 2013

Mr. Douglas Owenby, Vice President  
Nexteer Automotive  
3900 Holland Road  
Saginaw, Michigan 48601-9494

SRN: A6175, Saginaw County

Dear Mr. Owenby:

**VIOLATION NOTICE**

On September 26, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Nexteer Automotive located at 3900 Holland Road, Saginaw, Michigan. The purpose of this inspection was to determine Nexteer'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); the administrative rules and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A6175-2009.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Boiler 2 small natural gas fired unit	ROP condition EU BR02 VI 2	Emissions were calculated incorrectly by using multiple emission factors.
PC 08 Plant 4 phosphate coater scrubbers	ROP condition EU PC08 IV 1	Scrubber B – one water flow gauge did not have a needle indicator. Scrubber D – one flow indicator was reading 0 though some flow was evident.

Nexteer has applied for renewal of its ROP. In the submittal, a request was made to change pressure drop monitoring from the current weekly requirement to biweekly. The AQD will give due consideration to the request. However, it should be noted that though pressure drop devices are found on most scrubbers, many of the units are also required to have "a device to indicate if liquid is flowing into the scrubbers." Most scrubbers are not equipped with the devices. This fact has also not been reported as deviations in the reports required by the ROP program. At this point, the AQD has not cited these violations. In lieu of this, the AQD is requesting Nexteer to do a thorough re-evaluation of its Malfunction Abatement Plan. At minimum, it should make sure all

pollution controls are equipped with appropriate, working, required devices. Additionally, proper operating ranges as measured by the devices should be established after a thorough review to ensure they are reflective of current plant operations and conditions which will ensure effective air pollution control.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 25, 2013. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violation; 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 recurrence.

If Nexteer 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 me during my inspection of Nexteer. 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,



Ben Witkopp  
Environmental Engineer  
Air Quality Division  
989-894-6219

BAW/jd

cc: Ms. Kim Bostek, Nexteer  
Mr. Chris Hare, DEQ

cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ