



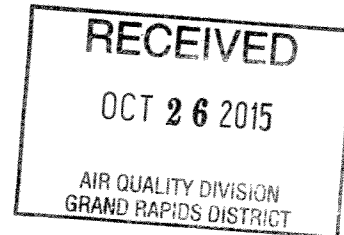
REGULATORY COMPLIANCE SPECIALISTS, INC.

www.rcsi.cc

P.O. BOX 455 * GREENVILLE, MICHIGAN 48838 * PHONE (616) 754-8556 * FAX (616) 754-3640

October 21, 2015

Mr. Eric Grinstern
MDEQ – AQD
State Office Building
350 Ottawa Ave. NW, Unit 10
Grand Rapids, MI 49503-2341



Dear Mr. Grinstern:

RCSI has been contracted by Century Foundry, Inc. located at 339 West Hovey Avenue, Muskegon Heights, MI to respond to the September 20, 2015 Violation Notice.

Century Foundry, Inc. will respond in the following manner:

Aluminum Foundry – 40 CFR Part 63, Subpart ZZZZZZ Aluminum, Copper and other Nonferrous Foundries Area Source NESHAP
Failure to submit initial notification and comply with the requirements of the NESHAP.

Dates violation occurred: June 27, 2011 to Present

Cause: It was determined, based on alloy standards, the facility did not melt any material containing HAPS above the applicability threshold. After reviewing formulation data from the supplier it was determined the facility did melt material containing HAPS above the applicability threshold and was, therefore, regulated by Subpart ZZZZZZ.

Duration of violation: June 27, 2011 to Present

Violation ongoing: Violation will be corrected by December 1, 2015.

Corrective actions: Century will submit the Initial Notification as required by Subpart ZZZZZZ by December 1, 2015. Century will also prepare a Management Practices Plan in accordance with Part 63.11550(a) and comply with the compliance requirements in Part 63.11553 by December 1, 2015.

Proposed date actions take place: December 1, 2015

Steps to prevent reoccurrence: A written management practices plan will be implemented.

Mr. Eric Grinstern
October 21, 2015
Page 2

Mold Making – PTI No. 43-05A EUMOLDMAKING SC 1.4
Failure to maintain material usage records.

Dates violation occurred: July 13, 2013 to Present

Cause: Usage records in the form of purchasing records are available for sand, resins and activator compounds; however, they are not in a computer spreadsheet format.

Duration of violation: July 13, 2013 to Present

Violation ongoing: Violation will be corrected by December 1, 2015.

Corrective actions: Century will maintain monthly and annual material usage records for sand, resins and activator compounds to comply with EUMOLDMAKING 1.4 Recordkeeping/Reporting/Notification. An example of the computer spreadsheet for reporting is attached for reference.

Proposed date actions take place: December 1, 2015

Steps to prevent reoccurrence: An example of the computer spreadsheet for data maintenance is attached for reference.

Electric Induction Furnaces (Crucible Furnaces) (Plant 1) – PTI No. 43-05A
FGPT1FURN1-2-3-4-5-6-7 SC 4.4
Failure to maintain material usage records.

Dates violation occurred: May 12, 2014 to January 5, 2015

Cause: Rough “Metal Melt Logs” were provided by Century to RCSI to transfer to a computer data base. Problems were encountered with data quality and compatibility with the data base format. RCSI was in the process of converting the data to a spreadsheet format to simplify data input and calculations at the time the facility was inspected.

Duration of violation: May 12, 2014 to January 5, 2015

Violation ongoing: Violation will be corrected by December 1, 2015.

Corrective actions: Century will supply the missing daily records of flux usage, aluminum melt and hours of operation for the record period of May 12, 2014 to January 5, 2015 and continue to maintain the spreadsheet to comply with FGPT1FURN1-2-3-4-5-6-7, 4.4 Recordkeeping/Reporting/Notification.

Proposed date actions take place: December 1, 2015

Steps to prevent reoccurrence: An example of the computer spreadsheet for data maintenance is attached for reference.

**Electric Induction Furnaces (Crucible Furnaces) (Plant 2) – PTI No. 43-05A
FGPT2FURN1-2-3-4-5 SC 5.4**

Failure to maintain material usage records.

Dates violation occurred: July 16, 2013 to December 16, 2014 (FGPT2FURN1-2-3-4 moved to 2425 Park Ave, Muskegon Heights, MI facility December 16, 2014. FGPT2FURN5 removed)

Cause: Rough “Metal Melt Logs” were provided by Century to RCSI to transfer to a computer data base. Problems were encountered with data quality and compatibility with the data base format. RCSI was in the process of converting the data to a spreadsheet format to simplify data input and calculations when the facility was inspected.

Duration of violation: July 16, 2013 to December 16, 2014

Violation ongoing: Violation will be corrected by December 1, 2015.

Corrective actions: Century will supply the available missing daily records of flux usage, aluminum melt and hours of operation for the record period from July 16, 2013 to December 16, 2014. FGPT2FURN1-2-3-4-5 is no longer located at this facility.

Proposed date actions take place: December 1, 2015

Steps to prevent reoccurrence: An example of the computer spreadsheet for data maintenance for the missing record period of July 16, 2013 to December 16, 2014 is attached for reference.

**Electric Induction Furnaces (Crucible Furnaces) (Plant 2) – PTI No. 43-05A
FGPT2FURN6-7 SC 6.4**

Failure to maintain material usage records.

Dates violation occurred: July 16, 2013 to Present

Cause: Rough “Metal Melt Logs” were provided by Century to RCSI to transfer to a computer data base. Problems were encountered with data quality and compatibility with the data base format. RCSI was in the process of converting the data to a spreadsheet format to simplify data input and calculations when the facility was inspected.

Mr. Eric Grinstern
October 21, 2015
Page 4

Duration of violation: July 16, 2013 to Present

Violation ongoing: Violation will be corrected by December 1, 2015.

Corrective actions: Century will supply the available missing daily records of flux usage, aluminum melt and hours of operation for the record period from July 16, 2013 to present and continue to maintain the spreadsheet to comply with FGPT2FURN6-7, 6.4 Recordkeeping/Reporting/Notification.

Proposed date actions take place: December 1, 2015

Steps to prevent reoccurrence: An example of the computer spreadsheet for data maintenance is attached for reference.

If you have any questions or concerns, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "William H. Hilton".

William H. Hilton
WHH/mlh
Enclosure

cc: Mr. Jim Brickley, Century Foundry, Inc.