



November 2, 2022
Project No. 220415

Eric Grinstern
Environmental Quality Analyst
Grand Rapids District Office
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
350 Ottawa Avenue, Unit 10
Grand Rapids, MI 49503-2341



Response to Violation Notice, dated September 30, 2022
Dicastal North America, Inc (SRN: N7688)
Greenville, Michigan

Dear Mr. Grinstern:

Dicastal North America, Inc. (Dicastal) has prepared this letter in response to the EGLE Violation Notice (VN) dated September 30, 2022. The VN alleges that Dicastal violated the following Special Conditions (SC) related to Permit to Install (PTI) 78-15H for emission units EU-LiquidCoat, EU-DChipdryer, and FG-Melting, as well as the rules for General Condition 11:

Process Description	Rule/Permit Condition Violated	Comments
<i>Liquid Coating Line (EU-LiquidCoat)</i>	<i>PTI No. 78-15H, EU-LiquidCoat, Special Conditions IV.5</i>	<i>Failure to properly maintain the air pressure differential at the levels established during testing to assure that the non-fugitive enclosure (NFE) is maintained and operated in a satisfactory manner.</i>
<i>Aluminum Chip Dryer (EU-DChipDryer)</i>	<i>PTI No. 78-15H, EU-DChipDryer, Special Conditions III.1 & 2; 40 CFR 63.1506(f)</i>	<i>Failure to maintain the thermal oxidizer temperature at or above the stack test established minimum temperature of 754 degree C on 105 occasions.</i>
<i>Aluminum Melting Furnaces (FG-Melting)</i>	<i>PTI No. 78-15H, FG-Melting, Special conditions IV.1</i>	<i>Failure to inject lime in the baghouse.</i>
<i>Sand Blasting Machine (EU-SandBlast)</i>	<i>PTI No. 78-15H, General Condition 11; R336.1301 (Rule 301); R336.1910 (Rule 910)</i>	<i>Opacity observed from the baghouse stack. Method 9 readings determined an opacity of 32.5%. fallout observed on the ground around the baghouse. Baghouse not operating properly.</i>

As requested, this letter provides information regarding the referenced citations, including:

- The date the alleged violations occurred
- An explanation of the causes and duration of the alleged violation
- Whether the violation is ongoing

- A summary of the actions that have been taken, and/or are proposed to be taken, to correct the violation, if any
- The date(s) by which these actions will take place
- What steps are being taken to prevent a reoccurrence.

Air Pressure Differential

During the recent EGLE-AQD inspection, it was discovered that air pressure differential gauge records indicated several days in which the gauges were outside of the ranges established during the previous performance test and/or the gauges were reading incorrectly. The paint line personnel are responsible for monitoring the gauges and recording the data at least once per day. Dicastal continues to believe that due to employee turnover, paint line personnel did not adequately understand that a supervisor must be notified if the pressure ranges are out of range or not reading correctly. However, based on the pressure readings observed, it appears that the coating line air flows may need to be rebalanced. Dicastal has reached out to a supplier to check and rebalance the air flows as needed. To complete this work, Dicastal may have to wait until shut down, which could be during the upcoming Thanksgiving or Christmas breaks. Dicastal will keep you informed of our progress, and the status of the air balance.

Chip Dryer Thermal Oxidizer Temperatures

As presented in the Semiannual Report for the first half of 2022, the thermal oxidizer temperature was not at or above the stack test established minimum temperature of 754°C on 105 occasions. A description of the deviations and causes can be found in the Semiannual Report. From August 16 to August 19, Dicastal conducted stack testing to establish a new lower 3-hour block temperature average from the previous minimum of 754°C. The new stack temperature range indicates that Dicastal can operate the thermal oxidizer as low as 700°C. At 700°C the dioxin/furan, volatile organic compounds (VOCs), and fine particulate matter less than 10 microns (PM₁₀) are well within permit limits. Though there were occasions when the thermal oxidizer temperature reading below 754°C, there were no instances of temperatures below 700°C; therefore, emissions would have been in compliance with the dioxin/furan limits that were established in 40 CFR Part 63 Subpart RRR.

Lime Injection

A failure to inject lime in the baghouse was noted during the EGLE-AQD inspection. On the day of the EGLE-AQD inspection, Dicastal was also conducting stack testing. As a result, Dicastal believes production personnel failed to check the lime hopper. We believe the failure to replace lime in the baghouse to be a one-time occurrence and which will be prevented going forward. To ensure this does not happen again, we have included the importance of immediate lime replacement has been emphasized in employee training. To prevent the lime running out on a busy day, the maintenance team will add *lime hopper inspection record* to the daily inspection of the baghouse to guarantee proper timing for lime replenishment. This will eliminate the possibility of the baghouse running out of lime entirely.

Sand Blasting Baghouse

Dicastal is investigating the report of dust surrounding the baghouse and opacity observed from the baghouse stack. Dicastal has shifted the responsibility for baghouse inspection and maintenance from the Production Department to the Maintenance Department to increase the frequency of baghouse/sand blaster inspections as well as to ensure more timely replacement of filters and better housekeeping during baghouse dust removal. Daily checks of the baghouse will be conducted until the issues are resolved. Dicastal also plans to contract an outside vendor to inspect and repair any faulty baghouse equipment.

Eric Grinstern
November 2, 2022

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Dicastal is committed to working with the EGLE to ensure the non-fugitive enclosure is maintained in compliance with all environmental regulatory requirements. If you have any questions or require additional information, please contact me at 616.619.7510 (senbody@dicastalna.com) or Zach Elliot at 616.619.7567 (zelliott@dicastalna.com).

Sincerely,



Dicastal North America Inc.

Shawna Enbody, MPH, ASP, CWCF

Environment, Health, & Safety Supervisor

By email and UPS

Copy: Jenine Camilleri – EGLE
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Stephanie A. Jarrett, PE – Fishbeck
Zach Elliot – Dicastal