



September 20, 2023  
Project No. 230398

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**Response to Violation Notice, dated August 23, 2023**  
**Dicastal North America, Inc (SRN: N7688)**  
**Greenville, Michigan**

Dicastal North America, Inc. (Dicastal) has prepared this letter in response to the EGLE Violation Notice (VN) dated August 23, 2023. The VN alleges that Dicastal violated the following Special Conditions (SC) related to Permit to Install (PTI) 78-15H for emission units EU-LiquidCoat and FG-Melting:

Process Description	Rule/Permit Condition Violated	Comments
Liquid Coating Line (EU-LiquidCoat)	PTI No. 78-15H, EU-LiquidCoat, Special Conditions IV.5	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.
Aluminum Melting Furnaces (FG-Melting)	PTI No. 78-15H, FG-Melting, Special Conditions II.1 and II.3	Exceedance of feed/charge and throughput limits.

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, AQD staff observed that six of the eight air pressure differential gauges were outside the ranges established during the previous performance test. 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. Dicastal has updated the work

instructions for reading pressure differential gauges (Attachment 1). All relevant employees have been or will be trained on the new document and training records will be available to AQD upon request.

Additionally, Dicastal has submitted a purchase request for new gauges which will tie into the programmable logic controller (PLC) and data management system (DMS). Prior to implementation of the DMS, Dicastal will review the requirements in the Malfunction Abatement Plan (MAP) with their contractor to ensure the appropriate monitoring is achievable; the MAP will be updated if necessary. Any updates required to the MAP will be submitted 45 days after the contractor reviews the system. Once the new gauges are installed, Dicastal will program the DMS to alarm and send an email to a specified distribution list if the readings are out of specification or the gauges are not working.

Additionally, Dicastal has scheduled Wenker to conduct air balancing in early October 2023.

### **Melt 1 and 2 Feed/Charge Rate**

Following review of Dicastal air permit records, EGLE-AQD noted that the records indicate the following:

- Melt 1 exceeded feed/charge limit of 3.31 tons per hour (tph) on 5 days
- Hold 1 exceeded feed/charge limit of 4.96 tph on 1 day
- Melt 2 exceeded feed/charge limit of 3.31 tph on 8 days
  - Dicastal noted 7 exceedances in the records for Melt 2 in May and June

Daily melt records are completed manually by Melt Shop personnel. Based on a review of the handwritten documentation, Dicastal believes that personnel may have inadvertently recorded production in the incorrect units. For example, on June 6, Dicastal recorded 128,941 kilograms (kg) were melted in Melt 1. It would not be possible to melt this weight of metal in one furnace; however, if this same quantity was in pounds (lb), the production would equate to approximately 58,487 kg per day (or 2.69 tph), which is in line with typical production rates and less than the permit limit of 3.31 tph. Unfortunately, Dicastal does not have an easy way to sort through the records to confirm the correct units. However, for the days in question, Dicastal reviewed the number of ladles poured, and estimated the average tons per hour for each Melt Furnace on those days. The table below presents the estimated average hourly values. The split between melt furnaces is based on the weighted average of what was recorded as melted.

Date	Total Ladles Poured (Capacity 3,000 lb/ 1,360.77 kg)	Ladles Poured Melt 1 and 2 (tons)	Melt 1 (average tph)	Melt 2 (average tph)
5/17/2023	80	120.0	3.04	1.96
5/22/2023	74	111.0	2.05	2.58
5/27/2023	95	142.5	2.66	3.27
5/28/2023	72	108.0	2.01	2.49
6/6/2023	95	142.5	3.83	2.11
6/16/2023	92	138.0	2.37	3.38
6/23/2023	37	55.5	2.31	
6/24/2023	102	153.0	3.19	3.19
6/25/2023	90	135.0	2.95	2.67
6/28/2023	98	147.0	2.87	3.25

As presented above, with the exception of Melt 1 on June 6, the values are compliant with permit limits. As previously discussed, the Melt 1 records for June 6 are well out of range of the capacity of the Melt Furnace. According to the Dicastal engineering team, the facility does not have the ability to hit the permit limits. We would also like to note that, although each furnace has a capacity limit, all emissions are routed to the lime injected baghouse and the air permit to install application, including modeling and emission limits were based on all the furnaces operating at maximum capacity and exhausting through the baghouse simultaneously. As you are aware, the Chip Furnaces are not currently operational and the combined melting and holding did not approach the overall amounts permitted. Dicastal will continue to review and update our records.

Dicastal has revised and simplified the work instruction for the team leads to fill out (see Attachment 2). All relevant employees have been or will be trained on the new document and training records will be available to AQD upon request.

Dicastal is committed to working with EGLE to ensure the non-fugitive enclosure is maintained in compliance with all environmental regulatory requirements. Dicastal is working diligently to find and correct (if possible) the daily melt records. If you have any questions or require additional information, please contact me at 616.619.7510 ([senbody@dicastalna.com](mailto:senbody@dicastalna.com)).

Sincerely,



**Dicastal Dicastal North America Inc.**



Shawna Enbody, MPH, ASP, CWCP  
**Environment, Health, & Safety Supervisor**

By email and UPS

Copy: Jenine Camilleri – EGLE  
Heidi Hollenbach – EGLE  
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Stephanie A. Jarrett, PE – Fishbeck