

September 4, 2020

Ms. Amanda Chapel  
chapela@michigan.gov  
Michigan Department of Environment, Great Lakes, and Energy  
Air Quality Division  
7953 Adobe Road  
Kalamazoo, MI 49009-5025

RE: Cosma Casting Michigan – SRN:N8223  
Violation Notice dated 14 August 2020

Dear Ms. Chapel:

This letter is in response to the Violation Notice (VN) issued to Cosma Casting Michigan (CCMi) on August 14, 2020. The VN alleges two Rule 201 violations.

**Melt Furnace #5**

The equipment which would constitute new melt furnace #5 was delivered to the CCMi site on August 4, 2020. Installation was started, but was immediately and completely halted on August 11 when the AQD letter denying a construction waiver was received.

No further construction related to this activity has occurred to date, nor will construction commence until a PTI has been issued or a construction waiver has been obtained.

In addition, the effort to permit Melt Furnace #6 and the two degassing stations is being suspended. CCMi is now only seeking to permit Melt Furnace #5 to serve as a swing furnace for overdue maintenance and repairs on the four existing melt furnaces.

[NOTE: The VN indicates that the rejection of the construction waiver “was due to the facility’s PTE showing they are a major source of HAPs and the facility possibly being subject to 40 CFR Part 63 Subpart RRR.”

- The facility is not currently a major source of HAPs under the constraints of PTI 166-13C. The PTI application for which the construction waiver was requested included the request to limit HAPs so that the facility will not be a major source of HAPs.

- CCMi is not subject to 40 CFR Part 63 Subpart RRR, which applies to major sources of HAPs at secondary aluminum production operations. CCMi is NOT a secondary aluminum production operation. PTI 166-13C specifically calls this out:

“The permittee shall melt only clean charge, customer returns, or internal scrap, as defined by 40 CFR Part 63 Subpart RRR. This condition is necessary to avoid requirements of 40 CFR Part 63 Subpart RRR, National Emission Standards for Secondary Aluminum Production.”]

### Degassing Stations

Prior to your site visit on August 12, 2020, CCMi’s environmental consultant Matt Kwiatkowski of Environmental Resources Management (ERM) had self-disclosed to AQD Permit Engineer Michelle Rogers that a portion of the fluxing operations at the facility had been migrated from the furnace area to the ladling area (degassing stations) in July of 2017 as part of a manufacturing process change. No increase in permitted fluxing volumes occurred.

In addition to this verbal disclosure to the permit engineer, the PTI application for the new furnaces at page 4 states:

“Additionally, existing and proposed degassing stations’ emissions will be captured under a hood and vented vertically to atmosphere.”

It was Mr. Kwiatkowski’s understanding that internal discussions at AQD Lansing had occurred and it was agreed that the prior operational change involving fluxing at the degassing stations:

- Created separate, individual degassing station emission units;
- As such, CCMi would need to seek a permit modification in the future to recognize any emissions at the degassing stations

ERM agreed, on behalf of CCMi, that such a permit modification would be the subject of a new PTI application in the future.

In preliminary efforts to address the permitting of the degassing emission units, ERM has worked with AQD permitting staff in an effort to determine an accurate emission factor for this type of operation. There are no published emission factors, and the only emission factor discovered that may be remotely applicable would result in double counting emissions since this is the same factor that has already been used to estimate emissions, with flux, from the melt furnaces.

Due to the unavailability of an appropriate emission factor for degassing stations with flux, and in order to accurately and properly permit the degassing units, CCMi will determine a site-specific emission factor through stack testing the degassing stations’ emissions. This emission factor will then be used to permit all existing degassing station emission units.

CCMi hereby commits to:

- scheduling appropriate stack testing as soon as possible (but after preparations for improved capture and discharge have been completed at the facility);
- Submitting a PTI modification application to AQD as soon as such emission factor is determined and able to properly represent the emissions in a full and complete PTI application; and
- Presenting a tentative and estimated timetable to AQD as soon as site preparations can be made and stack testing scheduled.

In the interim CCMi has reduced its fluxing usage at the existing degassing units by 79% (from 490 grams per ladle to 100 grams).

### **REQUEST FOR ENFORCEMENT DISCRETION**

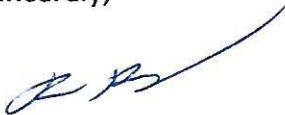
In closing, CCMi looks forward to working with EGLE to quickly and properly:

- permit its new Furnace #5 to avoid any production interruptions that may occur as a result of overdue maintenance to its permitted furnaces; and
- amend the existing PTI to recognize emissions at its existing degassing operations.

CCMi believes this response demonstrates the good faith efforts being exercised by CCMi, and asks for enforcement discretion on the VN for the reasons stated above. We look forward to our continued good working relationship and partnership with EGLE and AQD.

If there is any further information we can provide, please contact me at (269) 929-3926.

Sincerely,



Bryan Bowersox  
General Manager  
Cosma Casting Michigan

Cc:

Ms. Jenine Camilleri, EGLE  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Etheridge, EGLE  
Mr. Rex Lane, EGLE  
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