



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



DAN WYANT
DIRECTOR

November 5, 2015

CERTIFIED MAIL – 7010 0290 0000 3734 2507
RETURN RECEIPT REQUESTED

Mr. Edgar T. Crawley, Jr.
Vice President
Dundee Castings Company
500 Ypsilanti Street
Dundee, Michigan 48131

SRN: P0656, Monroe County

Dear Mr. Crawley:

VIOLATION NOTICE

On August 11, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Dundee Castings Company located at 500 Ypsilanti Street, Dundee, Michigan. The purpose of this inspection was to determine Dundee Castings Company 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 to investigate a recent complaint which we received on May 29, 2015, regarding dust being emitted uncontrolled and dust collection systems not operating properly attributed to Dundee Castings Company operations.

During the inspection and review of additional information received, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Two Thermtronix TF-3000 Electric Furnaces	Rule 336.1201	Failure to obtain Permit to Install prior to installation and operation.
Three Mifco DO600A Dip Out Furnaces		
Four Morgan EL-500 Transfer Ladles		
Two Degassing Units		
Miscellaneous Grinders, Drills, Buffers, Band Saws, and Sanders		

During this inspection and review of additional information received, it was determined that Dundee Castings Company had installed and commenced operation of five aluminum melting furnaces, four transfer ladles, and two degassing units at this facility prior to obtaining Permits to Install; this is a violation of Act 451, Rule 201. It is noted that Dundee Castings Company submitted information following the inspection in order to qualify for the Rule 290 exemption from the requirement to obtain a permit to install for the above listed equipment. However, since these furnaces and associated equipment are or have melted aluminum alloys with Safety Data Sheets that list either nickel and/or beryllium as components, Rule 290 is not applicable. The initial risk screening levels (IRSLs) for nickel and beryllium are below the allowed level for Rule 290 exemption.

In addition, Dundee Castings Company operates miscellaneous grinders, drills, buffers, band saws, and sanders that are externally exhausted to a cyclone collector alone and therefore do not qualify for the Rule 201 exemption pursuant to Rule 285(l)(vi)(c) which requires a Fabric Filter collector.

A program for compliance may include a completed PTI application for the two Thermtronix TF-3000 Electric Furnaces, three Mifco DO600A Dip Out Furnaces, four Morgan EL-500 Transfer Ladles, two Degassing Units and miscellaneous Grinders, Drills, Buffers, Band Saws, Sanders process equipment. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

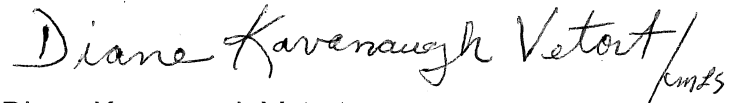
Be advised that Rule 201 requires a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 25, 2015. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Dundee Castings Company 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 violation cited above and for the cooperation that was extended to me during my inspection of Dundee Castings Company. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in cursive script that reads "Diane Kavanaugh Vetort". To the right of the signature, there are initials "kmb" written in a smaller, less distinct cursive hand.

Diane Kavanaugh Vetort
Senior Environmental Quality Analyst
Air Quality Division
517-780-7864

cc: Mr. Scott Miller, DEQ

cc/via e-mail: Mr. Brian P. Greenwald, P.E., Barr Engineering
Mr. Steven E. Chester, Miller, Canfield, Paddock and Stone, P.L.C.
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ