

April 7, 2014

Mr. Eric Grinstern
Environmental Quality Specialist
MDEQ-AQD

Dear Mr. Grinstern,

In reply to: Violation Notice dated March 18, 2014

This letter responds to your letter dated March 18, 2014. Cadillac Casting, Inc. (CCI) appreciates the opportunity to respond to your observations and statements and looks forward to working with the MDEQ to resolve them and proceed with the ROP renewal process. We have reviewed your listed observations as described from the March 3, 2014 inspection. We offer the following response.

EUFINISHING – Operation of the Sby baghouse outside of the pressure drop range established to determine proper operation. CCI determined that the existing magnehelic pressure gauge was giving erroneous readings due to loose fittings and an older gauge. The baghouse itself was operating properly and sending the filtered air back into the plant through its HEPA as designed.

We have replaced the pressure gauge with a new one that has a more precise range of 0-10 inches (see Figure 1). The new gauge is reading correctly. We have also modified our daily ROP conditions check sheet to include the pressure ranges for each baghouse and more detailed instructions to contact our maintenance department when readings are outside of the ranges (attached).

FGMACT – Failure to Conduct Opacity testing every 6 months in 2013. This task was on my compliance calendar but was missed in 2013. Network Environmental was hired to conduct the testing on March 12, 2014. They are also scheduled for September 3, 2014. This required testing will be scheduled six months out as each test is concluded.

It was additionally noted that CCI did not conduct VOC emission testing for the packed bed scrubbers that control our DMIPA emissions. You also noted that the department was aware that CCI has requested the removal of this requirement in our ROP renewal application. We had good discussion about this request during your inspection and we look forward to working through this modification in the ROP renewal process.



This response is submitted with complete reservation of CCI's rights and defenses and without any admission of violation of law or regulation. Cadillac Casting, Inc. takes our ROP and MACT compliance very seriously. We feel we have demonstrated good compliance practices and openness in working with the AQD to achieve it. We appreciate the input given during the inspections and look forward to working with you and the AQD in the future. Please call me with any questions or concerns to this response.

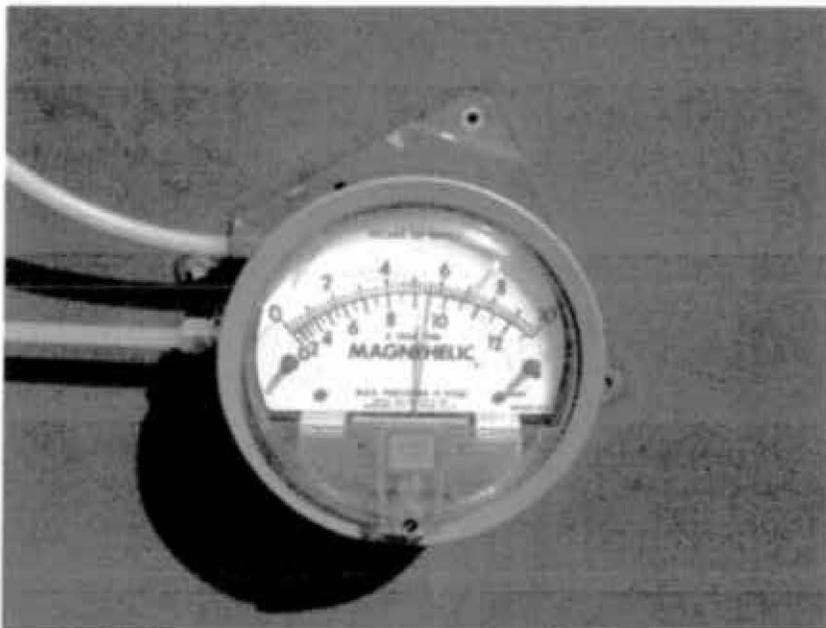
Sincerely,

A handwritten signature in black ink, appearing to read 'Erik Olson', is written over a white background.

Erik Olson

Cc: Mark Wightman, General Manager, CCI
Marty Stromberger, Senior Project Manager, TRC

Figure 1: SLY Baghouse's new pressure gauge



FORM 650

Daily Environmental Operators Check List

This check list has been created to satisfy the daily records required in the ROP No. MI-ROP-B2178-2008a

Date: _____

EGMELTING

Cupola stack exhaust opacity ¹ yes/no

EGCOREMOLDMAKING

TEA Scrubber flow rate _____

TEA scrubber opacity ¹ yes/no

EGSPOGREENSAND

Carter Day baghouse Diff. pressure (1.5-5 inch) _____

Carter Day baghouse opacity ¹ yes/no

North Multiwash opacity ¹ yes/no

North multiwash Flowrate (150 gpm min) _____

North multiwash pressure (> 7 in) _____

EGFINISHING

40K baghouse opacity ¹ yes/no

40K baghouse diff. Pressure reading (2-6 inch) _____

12K baghouse opacity ¹ yes/no

12K baghouse diff. Pressure reading (1-8 inch) _____

SLY Baghouse diff. pressure reading (2-6 inch) _____

Daily sheets are to be turned in to the HSE Manager.

Any abnormal conditions are to be reported immediately.

1 - If visible emissions are present, the following information must be recorded:

- a) color of the emissions
- b) Whether the emissions are representative of normal operations

EGSPOBREAKSORT

1) 80K baghouse Diff pressure (1-10 inch) _____

80K baghouse opacity ¹ yes/no

2) 80k ETA Baghouse Diff Pressure _____

100 k ETA baghouse Opacity¹ _____

EGSPOSHAKEOUT

South multiwash opacity ¹ yes/no

South multiwash Flowrate (150 gpm min) _____

South multiwash pressure (> 7 in) _____

EGALINE

RTO Opacity ¹ yes/no

RTO Temperature reading (1500 °F min.) _____

EGALINEMOLD

East Dakota scrubber flow rate (50 gpm min.) _____

East Dakota scrubber pH (max of 5) _____

West Dakota scrubber flow rate (50 gpm min.) _____

West Dakota scrubber pH (max of 5) _____

SIGN-OFF Date