



*Asama
Coldwater
Manufacturing,
Inc.*

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Coldwater, Michigan 49036
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Mr. Rex Lane
MDEQ Air Quality Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49004-5026



October 16, 2014

Re: Response to NOV of September 26, 2014

Dear Mr. Lane:

Following is our response to the observations made on the inspection of September 16, 2014.

Process Description: EU-SS

Rule/ Permit Condition Violated: PTI No. 280-06B, Condition VI.1

Permittee is required to monitor and record the pressure drop across the EU-SS baghouse on a continuing basis when the baghouse is operating.

Asama Coldwater Manufacturing (ACM) continuously monitors the pressure drop across the baghouse. The pressure drop is recorded on each shift (three times per day) when the baghouse is operating as was verified during the inspection. This condition has existed from the initial startup of the new foundry and exists currently. In order to continuously record (at least one reading per 15 minute period) while the baghouse is in operation, ACM will install the necessary equipment to transmit the reading on a continuous basis to a server where it will be stored. Expected completion of this project is January 4, 2015.

Process Description: EU-CCFBACK

Rule/ Permit Condition Violated: PTI No. 280-06B, Condition VI.1

Permittee is required to monitor and record the pressure drop across the EU-SS baghouse on a continuing basis when the baghouse is operating.

ACM continuously monitors the pressure drop across the baghouse. The pressure drop is recorded on each shift (three times per day) when the baghouse is operating as was verified during the inspection. This condition has existed from the initial startup of the new foundry and exists currently. In order to continuously record (at least one reading per 15 minute period) while the baghouse is in operation, ACM will be installing the necessary equipment to transmit the reading on a continuous basis to a server where it will be stored. Expected completion of this project is January 4, 2015.

Process Description: FG-COATING

Rule/ Permit Condition Violated: PTI No. 177-11, Condition Nos. VIII.1 through VIII.6

Coating line stacks are fitted with rain caps, which is a violation of the permit condition that requires stack exhaust gases to be discharged unobstructed vertically upwards to the ambient air.

The rain caps have been in place since the installation of the stacks. ACM will reconfigure the stacks to an offset elbow design with rain drains, maintaining the current stack diameters and heights. Expected completion of this project is January 4, 2015.

Please do not hesitate to contact me if you have any questions regarding our countermeasures. I can be reached at 517-278-0115 or via email at brent_cravens@asamacm.com.

Sincerely,



Brent Cravens
EHS Coordinator