

June 21, 2019

Joseph Forth
Environmental Quality Analyst
Air Quality Division
Department of Environment, Great Lakes, and Energy
27700 Donald Court
Warren, Michigan 48092-2793

Subject: Violation Notice (Odor Compliant) Dated June 11, 2019

Dear Mr. Forth:

This letter is being submitted to meet the response requirement included in the June 11, 2019 Violation Notice. This response is tailored to respond to the Violation as required in the Notice.

Date of Alleged Violation:

May 3, 2019

Explanation of Causes and Duration of the Violation:

Continental Aluminum (Continental) has reviewed the facility parametric data for the date and time in question. During this period all parametric data for the equipment shows compliance with the required thresholds. Some of this data from our CMS system is provided in Attachment A of this document. In interviews with our operations staff we have not noted any variances from normal operation. Additionally, the facility baghouses were replaced last year and therefore the facility has new baghouses in operation that would not show any age degradation at this point. Based on our thorough review of the processes during the time in question, Continental cannot locate a root cause or a parametric variable that shows that the facility was operating out of normal compliance operations during this period. Data collected demonstrates that Continental was operating in compliance with permit requirements during this period of time and is unsure of the relation of the odor to the facility operations.

Whether the Violation is On-Going:

The violation is not on-going and Continental is not sure that the violation came from the Milford Road facility.

