



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT  
DIRECTOR

September 10, 2014

Mr. Fred Lindsay, President  
Continental Aluminum  
29201 Milford Road  
New Hudson, Michigan 48165-974

SRN: N6013, Oakland (63) County

Dear Mr. Lindsay:

**VIOLATION NOTICE**

On September 3, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Continental Aluminum ("Continental") located at 29201 Milford Road, New Hudson, Michigan. The purpose of this inspection was to determine Continental's 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; the conditions of Permit to Install (PTI) number 504-96F; and to investigate a recent complaint which we received on September 2, 2014 (Lannie Young e-mail 12:25 p.m., Tuesday, September 2, 2014), regarding extreme odor (2:45 p.m., Saturday, August 30, 2014, incident) detectable all the way near Lowe's and Walmart attributed to Continental's operations.

During the September 03, 2014, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-ROTARY	<p>NESHAP / MACT RRR, 40 CFR, Part 63, Subpart RRR and PTI No. 504-96F</p> <p>FG-ROTARY, III.2: minimum 37 lbs. / hr. lime injection rate into the baghouse (RO BH2) shall be maintained (40 CFR, 63.1506(m)(3))</p> <p>FG-ROTARY, IV.1: the baghouse RO BH2 shall be installed and operating properly</p> <p>FG-ROTARY, IV.5: ensure lime is free flowing into the baghouse RO BH2 (40 CFR, 63.1510(i))</p>	<p>On Saturday, August 30, 2014 (about 2 p.m.), RO lime feeder did not operate for about four hours. This is a violation of PTI No. 504-96F and MACT 3R.</p>
<p>Failure to operate both carbon feeder and lime feeder that feed acid and odor control materials into the RO BH2 baghouse caused extreme odor in the area based upon Lyon Township officials observations.</p>		

**Secondary aluminum production** processes are subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source NESHAP / MACT RRR, 40 CFR Part 63, Subpart RRR, National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production. These standards are found in 40 CFR, Part 63, Subpart RRR.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 1, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

At minimum, the compliance plan/program must include the following:

1. Root cause analysis of feeders (RV1 & RO lime and carbon) failure.
2. Inspection log that the lime and carbon feeders are working properly as expected (1/hr.).
3. Lime feed rates concerning RV1 and RO lime feeders (1/hr.).
4. Lime and carbon feed rates concerning RV1 and RO common/shared feeder (1/hr.).

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

Sincerely,



Iranna Konanahalli  
Senior Environmental Engineer  
Air Quality Division  
586-753-3741 or konanahallii@michigan.gov

ISK/DC

cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Ethridge, DEQ