



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GRETHER  
DIRECTOR

December 5, 2018

Mr. Adam Perry, Vice President of Operation  
Global Titanium, Inc.  
19300 Filer Avenue  
Detroit, MI 48234

SRN: A8892, Wayne County

Dear Mr. Perry:

**VIOLATION NOTICE**

On October 24, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a site visit of Global Titanium located at 19300 Filer Avenue, Detroit, Michigan. The purpose of the site visit was to determine Global Titanium'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 Air Pollution Control Rules; and the conditions of Wayne County Installation Permit (WCIP) C-11750 at Global Titanium's 7 Mile Building. On October 26, 2018, the AQD issued a Rule 278a letter requesting the company to demonstrate permit to install exemptions for processes and equipment at the 7 Mile Building and to demonstrate that Rule 278 does not apply. A response from Global Titanium was received on November 26, 2018.

As a result of the site visit on October 24, 2018, and review of Global Titanium's response dated November 26, 2018, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Metal Injection Molding	R 336.1201(1)	Installation of Metal Injection Molding, Investment Casting and Ingot Casting equipment without obtaining a permit to install pursuant to R 336.1201(1).
Investment Casting (Lost Wax Casting)		
Ingot Casting		

**Rule 201 Violations**

R 336.1201(1) (Rule 201) is defined as follows.

Rule 201. (1) Except as allowed in R 336.1202, R 336.1277 to R 336.1291, or R 336.2823(15) a person shall not install, construct, reconstruct, relocate, or modify any process or process equipment, including control equipment

pertaining thereto, which may emit any of the following, unless a permit to install that authorizes such action is issued by the department.

- (a) Any air pollutant regulated by title I of the clean air act and its associated rules, including 40 C.F.R. §51.165 and §51.166, adopted by reference in R 336.1902.
- (b) Any air contaminant.

During the site visit on October 24, 2018, it was noted that Global Titanium has installed equipment for the Investment Casting (Lost-Wax Casting), Metal Injection Molding, and Ingot Casting processes. On October 26, 2018, the AQD issued a letter requesting that Global Titanium provide the following information for process equipment at the 7 Mile Building.

- A description of the exempt process or process equipment, including the date of installation.
- The specific exemption being used by the process or process equipment.
- An analysis demonstrating that Rule 278 does not apply to the process or process equipment.

On November 26, 2018, the AQD received a response from Global Titanium. The response does not provide a permit exemption for the above listed processes or equipment, with the exception of welding (R 336.1285(2)(i)) and torch cutting equipment (R 336.1285(2)(j)(ii)).

Based on the November 26, 2018, it appears the equipment associated with the Investment Casting (Lost-Wax Casting), Metal Injection Molding, and Ingot Casting equipment are in violation of R 336.1201 as a PTI exemption has not been identified and the equipment is not permitted by WCIP C-11750.

A program for compliance may include a completed PTI application for the above listed processes and associated equipment. An application form is available by request, or at the following website: [www.michigan.gov/deqair](http://www.michigan.gov/deqair) (in the shaded box on the upper right hand side of the page)

Be advised that Rule 201 requires that 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 violations and submit a written response to this Violation Notice by December 26, 2018 (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.

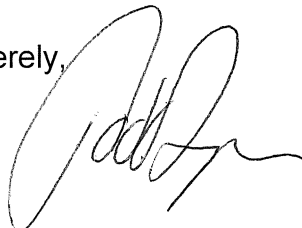
Mr. Adam Perry  
Page 3  
December 5, 2018

Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Global Titanium 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. 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,

A handwritten signature in black ink, appearing to read 'Todd Zynda', written over a light blue horizontal line.

Todd Zynda, P.E.  
Senior Environmental Engineer  
Air Quality Division  
313-456-2761

cc: Mr. Paul Max, City of Detroit, BSEED  
Ms. Mary Ann Dolehanty, DEQ  
Dr. Eduardo Olaguer, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ