

January 29, 2020

FedEx Tracking: 7776 3262 7932

Ms. Gina McCann
Senior Environmental Quality Analyst
MI EGLE - Air Quality Division
Bay City District Office
401 Ketchum St. Suite B
Bay City, MI. 48708

DEQ-AQD

FEB 03 2020

SAGINAW BAY

Re: General Motors, LLC - Saginaw Metal Casting Operations – SRN: B1991
EU-SPMCASTLINE4 (Section 3) Response to Violation Notice (VN)

Dear Ms. McCann:

This letter is in response to the January 10, 2020 Violation Notice (VN) received by General Motors LLC (GM) - Saginaw Metal Casting Operations (SMCO) on January 13, 2020. The VN alleges that SMCO violated Rule 201 of the administrative rules promulgated under Act 451 due to the modification of Section 3 (finishing operations) of EU-SPMCASTLINE4.

As background information, SMCO operates EU-SPMCASTLINE4 Section 3 (Finishing) pursuant to Renewable Operating Permit MI-ROP-B1991-2015c. The finishing operation removes large pieces of aluminum from the parts cast in Section 1 of EU-SPMCASTLINE4 to make the parts dimensionally correct before moving on to a machining process. This process requires the use of a lubricant to assist with the cutting of the aluminum parts. To help manage airborne mist in the plant, SMCO installed two mist collectors to this operation that exhausted internally into the plant. On November 1, 2019, the mist collectors were ducted to an externally exhausted comfort ventilation system due to mist collector fan failure. The mist collectors' three-stage filter system remained in use at all times.

This physical change was first identified by SMCO Environmental on November 26, 2019 while preparing for a discussion with MI EGLE-AQD relative to permit to install (PTI) application no. 36-12I dated October 14, 2019. SMCO notified EGLE of this change on December 5, 2019 by email and proposed adding this change to PTI No. 36-12I during a conference call on December 10, 2019. After further review, GM determined that the preferred corrective action was to return the process to an internal exhaust configuration and executed this change on December 18, 2019 when the general ventilation fan was turned off and subsequently locked out and physically disconnected from the mist collectors.

The alleged violation occurred from November 1, 2019 to December 18, 2019, when the comfort ventilation exhaust fan was turned off. SMCO will be replacing the failed mist collector fans with new

fans, which will exhaust internal to the facility. Further, on December 18, 2019, the SMCO maintenance team was retrained on SMCO's internal Environmental Management of Change process to ensure modifications are evaluated for air quality compliance prior to being implemented.

Please note that GM makes no admissions and reserves all of its rights and remedies with respect to this matter, including but not limited to all rights to contest the allegations of the VN.

If you should have any further questions about this incident or the corrective measures taken, please feel free to contact Ken Fryer, Sr. Environmental Engineer (248) 534-8611.

Regards,



John Lancaster
Plant Director, GM-SMCO

cc: Ken Fryer, GM-SMCO
Ms. Jenine Camilleri, EGLE