



November 8, 2021

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

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

Dear Ms. McCann:

This letter is in response to the October 29, 2021 Violation Notice (VN) received by General Motors LLC (GM) – Saginaw Metal Casting Operations (SMCO) via email. The VN alleges that SMCO violated the ROP MI-ROP-B1991-2021 Condition I.4 permit limit under EU-PSANDSCCSH on September 2, 2021 based on stack test results that indicate VOC emissions for EU-PSANDSCCSH were 6.46 pounds per hour (lb/hr) and in excess of the 3.99 lb/hr VOC emissions limit. Emissions data at EU-PSANDSCCSH stack SV-Z02-BH-6 prior to September 2, 2021 do not exist. Please note that the combined emissions (7.84 lb/hr) from the precision sand emission units, EU-PSANDCASTLINE and EU-PSANDSCCSH were below the combined emission limit of 8.06 lb/hr.

The results of the September 2, 2021 testing exceeded the previously estimated VOC emission factors for the resin bound to the precision sand being processed after shakeout. Those estimates were performed for the original permit to install application preparation. GM implemented the following corrective actions:

- September 2, 2021 – Ken Fryer (GM) contacted Gina McCann (EGLE) when GM received preliminary results in excess of the 3.99 lb/hr VOC emissions limit for EU-PSANDSCCSH.
- September 3, 2021 – GM began evaluating potential engineering solutions to re-route portions of the emissions duct from EU-PSANDSCCSH to EU-PSANDCASTLINE, which is controlled by an RTO.
- September 10, 2021 – Once the compliance test results were confirmed, the EU-PSANDSCCSH to EU-PSANDCASTLINE ceased operation until October 18, 2021.
- September 23, 2021 – GM scheduled a pre-application meeting with Michigan EGLE-AQD.
- September 29, 2021 – GM submitted a Construction Waiver request to the Michigan EGLE district office requesting a waiver of the permit requirements to allow GM SMCO to begin connecting portions of the EU-PSANDSCCSH emissions duct to the EU-PSANDCASTLINE regenerative thermal oxidizer.

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**general motors**

Saginaw Metal Casting Operations / 1629 N. Washington Ave / Saginaw, MI 48601 / [www.gm.com](http://www.gm.com)



- September 29, 2021 – GM submitted new emissions calculations with revised emission factors with PTI No. APP-2021-0242 (36-12L) to EGLE-AQD.
- October 6, 2021 – Michigan EGLE issued the construction waiver.
- October 6, 2021 – GM accepted conditions of the construction waiver, which allowed GM SMCO to re-route portions of emissions duct from EU-PSANDSCCSH to EU-PSANDCASTLINE.
- October 8, 2021 – GM SMCO re-routed portions of the emissions duct from EU-PSANDSCCSH to EU-PSANDCASTLINE. Specifically, duct work that handles emissions from broken cores and molds between shakeout and the rotary Didion drum was diverted from the EU-PSANDSCCSH stack SV-Z02-BH-6 to the EU-PSANDCASTLINE stack SV-Z02-RTO-03.
- October 14, 2021 – Michigan EGLE provided verbal approval of PTI 36-12L with a new EU-PSANDSCCSH (NKA, EU-PSANDSH) emissions limit of 8.24 lb/hr.
- October 14, 2021 – GM SMCO submitted the permit modification to incorporate the terms and conditions of PTI 36-12L.
- October 18, 2021 – Precision sand production resumed.

The September 2, 2021 compliance test results provide evidence that emissions from EU-PSANDSCCSH are less than the revised permit limit of 8.24 lb/hr. However, GM plans to re-test both EU-PSANDSCCSH and EU-PSANDCASTLINE within 180 days of permit issuance.

EU-PSANDSCCSH	Run 1	Run 2	Run 3	Average
VOC (lb/hr)	2.96	7.54	8.87	6.46

Please note that GM makes no admissions and reserves all of its rights and remedies with respect to this matter.

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



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