



January 13, 2022

**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-SPMPROCESSAND Response to Violation Notice (VN)**

Dear Ms. McCann:

This letter is in response to the January 7, 2022 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.6 permit limit under EU-SPMPROCESSAND on November 2, 2021 based on stack test results that indicate particulate matter (PM) emissions for EU-SPMPROCESSAND were 5.05 pounds per hour (lb/hr) and in excess of the 0.19 lb/hr PM emissions limit.

The duration of the PM emissions is unknown because the previous quarterly inspections as well as the differential pressure and visible emissions monitoring did not indicate issues associated with the EU-SPMPROCESSAND fabric filter collector. The EU-SPMPROCESSAND fabric filter collector is inspected quarterly and was inspected during October 2021 prior to the November 2, 2021 compliance test. Emission Unit EU-SPMPROCESSAND was shut down December 10, 2021 – January 3, 2022.

The following is a summary of the actions that have been taken and are proposed to be taken to correct the matter and prevent a reoccurrence:

- January 3, 2022 – GM received PM results in excess of the 0.19 lb/hr PM emissions limit for EU-SPMPROCESSAND.
- January 3, 2022 - Alex Thibeault (GM) contacted Gina McCann (MI EGLE) after GM received PM results in excess of the permit PM emission limit.
- January 4, 2022 – GM performed a comprehensive inspection of the SPMPROCESSAND fabric filters discovering 12 damaged fabric filters. The fabric filters were replaced the same day.
- January 5, 2022 – Based on the unique bag damage seen on January 4, 2022, GM performed a comprehensive inspection of the compressed air headers discovering damaged compressed air pulse nozzles. As a result, GM immediately began procuring replacement air pulse nozzle material.

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- January 9, 2022 – GM replaced 28 compressed air pulse nozzles discovered during the January 5, 2022 inspection.
- January 22, 2022 - GM plans to review and if necessary revise the preventative maintenance instructions to include a more comprehensive visual observation of fabric filter components.
- January 22, 2022 – GM scheduled replacement of all fabric filters in the EU-SPMPROCESSAND fabric filter collector.
- February 21-25, 2022 – Montrose Environmental is scheduled to retest the EU-SPMPROCESSAND reclaim unit.

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 Alex Thibeault, Sr. Environmental Engineer (810) 577-9003.

Regards,

 1/17/22

John Lancaster
Plant Director, GM-SMCO

cc: Ms. Alex Thibeault, GM-SMCO
Ms. Jenine Camilleri, Michigan EGLE

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