



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE

EGLE
LIESL EICHLER CLARK
DIRECTOR

December 19, 2019

Mr. Jay Lawson
Cooper Foundry, Inc.
8216 Douglas Avenue
Kalamazoo, Michigan 49009

SRN: B8878, Kalamazoo County

Dear Mr. Lawson:

VIOLATION NOTICE

On November 20, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Cooper Foundry Inc. located at 8216 Douglas Avenue, Kalamazoo, Michigan. The purpose of this inspection was to determine the facility'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); and the Air Pollution Control Rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Metal furnaces	R 336.1201 (Rule 201)	The flux material that is used in the furnaces contains fluoride, and therefore cannot be considered exempt under the Rule 282(2)(a)(iv). The facility also does not have a permit.
Sand Silo	R 336.1201 (Rule 201)	Sand was seen around the silo. The silo does not have an appropriately operated filtration system. Therefore, the silo cannot be considered exempt under the Rule 284(2)(k) exemption. The facility also does not have a permit.

The facility will need to either change their flux material so that it can comply with an exemption or will need to apply for a permit. For the silo, the facility will need to either install an appropriate filtration system so that it complies with an exemption or will need to apply for a permit.

A program for compliance may include a completed PTI application for the metal furnaces and sand silo equipment. An application form is available by request, or at the following website: www.michigan.gov/air (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.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 16, 2020 (which coincides with 28 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.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Cooper Foundry Inc. 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 the facility. 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,



Monica Brothers
Environmental Quality Analyst
Air Quality Division
269-567-3552

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE