

2/3/14

Dorothy Bohn  
DEQ  
7953 Adobe Road  
Kalamazoo, MI 49009



RE: Violation PTI No. 31-01, Condition I.1  
Violation PTI No. 31-01, Condition VIII.1  
Violation PTI no. 249-10, Condition VII.1 and 2

Dorothy,

On January 8<sup>th</sup>, 2014 you arrived to complete an unannounced inspection @10:00AM.

After review of our records and permits you have cited our plant with (3) violations:

Violation 1: The facility is not keeping the sourcewide total volatile organic compounds emission calculations.

Response 1: Upon your visit I opened the wrong file at first to find the last quarter monthly numbers missing. After you left I opened the correct file with all (12) months included in the file. But I failed to complete the (12) month rolling total. I have added a column to verify that the 12 month rolling total will be included in the month end calculations and will add this reminder to my environmental month end calendar for complete calculations during the first (2) weeks of each month.

Violation 2: Stack height is not 1.5 times the building height

Response 2: This permit has been in place since 2001 I was unaware that the stack height was not to the height required in the permit. This should have been addressed by me upon my arrival in 2005 but I did not. I will review all pertinent permits to verify compliance to all regulatory affairs. At this point the roof height is approximately 30 foot. This would require a 45 foot stack. The was some confusion on this roof height due to changing heights and where the stack actually sits on the roof. I will plan to resubmit a new General air permit to replace 31-01. It would be very difficult to add a stack of that height to this portion of the building. I would ask for your assistance in this matter so I accurately complete this to the needs of the MDEQ and future of the Benteler plant.

Violation 3: The facility did not submit any of the required reports.

Response 3: WIN wax operation at this point has ceased. I'm not sure if this line will run again and if it does it will take 3-4 months to get material available. This permit has expired on 12/31/13. If necessary to complete this operation in the future we may ask for an exemption. In regards to reporting I will

verify upon completion of the new or changed permit (if applicable) and add to the environmental calendar to assure accurate reporting in the future.

A handwritten signature in black ink, appearing to read 'Chris Collins', written over a horizontal line.

Regards

Chris Collins  
SHE/ Facilities MGR  
Benteler Automotive  
9000 East Michigan Ave  
Galesburg, MI 49053  
Phone: 269-998-3006