STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

RICK SNYDER
GOVERNOR

DAN WYANT
DIRECTOR

July 27, 2015

Mr. Mark Buchner, President
Continental Aluminum
29201 Milford Road
New Hudson, Michigan 48165-974

SRN: N6013, Oakland County

Dear Mr. Buchner:

VIOLATION NOTICE

On July 23, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Continental Aluminum (Continental) located at 29201 Milford Road, New Hudson, Michigan. The purpose of this inspection was to determine Continental'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); the administrative rules; the conditions of Permit to Install (PTI) number PTI No. 504-96F.

During the July 23, 2015 inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-RV1	NESHAP/MACT RRR, 40 CFR, Part 63, Subpart RRR and PTI No. 504-96F. FG-RV1, II.2: permittee shall not exceed maximum flux usage (in pounds per ton feed) limit as defined by September 2013 and June 2014 stack tests. NESHAP/MACT RRR, 40 CFR, Part 63, Subpart RRR, § 63.1512 Performance test/ compliance demonstration requirements and procedures.	Continental routinely exceeded flux usage limit of 209.68 pounds of flux per ton of scrap charge (i.e. 10.5%). Flux usage rate of 10-20% based upon 3-hour block average is a common occurrence.
September 24-26, 2013 (RO [Baghouse under two conditions: Condition1 - max. flux and Conditon2 - max. temperature & minimum required lime] and RV1 (sidewell Baghouse)), and June 12-13, 2014 (natural gas fired RV1 combustion/hearth stack – uncontrolled, i.e., no baghouse) stack tests established maximum flux usage rates for both RV1 and RO. The stack tests established maximum RV1 flux rate of 209.68 pounds of flux per ton of scrap or 10.5%. If Continental chooses to re-establish flux rate (pounds of flux per ton of feed) using a repeat stack test for all pollutant parameters (PM, PM2.5, HCl, HF, D/F), special attention must be paid to stack test sampling period/averaging time. In addition, it must be noted that both RV1 baghouse and RV1 Hearth (uncontrolled natural gas combustion) stacks must be sampled simultaneously.		

Secondary aluminum production processes are subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source NESHAP/MACT RRR, 40 CFR Part 63, Subpart RRR, National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production. These standards are found in 40 CFR, Part 63, Subpart RRR.

Please initiate actions necessary to correct the cited violations and submit **a written response to this Violation Notice by August 17, 2015** (which coincides with 21 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.

If Continental 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 Continental. 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,

Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
586-753-3741 or konanahallii@michigan.gov

IK/DC

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ