



April 24, 2019
Project No. 190119



Mr. Eric Grinstern
Environmental Quality Analyst
Grand Rapids District Office
Air Quality Division
Michigan Department of Environmental Quality
350 Ottawa Avenue, Unit 10
Grand Rapids, MI 49503-2341

Re: Response to Violation Notice, dated March 18, 2019
Dicastal North America, Inc (SRN: N7688)
Greenville, Michigan

Dear Mr. Grinstern:

Dicastal North America, Inc. (Dicastal) has prepared this letter in response to the MDEQ Violation Notice (VN) dated March 18, 2019. The VN indicates that Dicastal violated the following special conditions (SC) related to Air Use Permit to Install (PTI) 78-15D for emission unit EU-ChipDryer:

Process Description	Rule/Permit Condition Violated	Comments
<i>Aluminum Chip Dryer (EU-ChipDryer)</i>	<i>PTI 78-15D, EU-ChipDryer, Special Condition III.2; 40 CFR 63.1506(f)</i>	<i>Failure to maintain a minimum thermal oxidizer 3-hour block average temperature above 725 degrees Celsius.</i>

As requested, this letter provides information regarding the referenced citations, including:

- the date the alleged violations occurred
- an explanation of the causes and duration of the alleged violation
- whether the violation is ongoing
- a summary of the actions that have been taken, and/or are proposed to be taken, to correct the violation
- the date(s) by which these actions will take place
- what steps are being taken to prevent a reoccurrence.

Most of the information requested has been previously submitted as part of Dicastal's semiannual report, submitted earlier this year. As described in the semiannual report, temperature excursions within the thermal oxidizer stemmed from startup, shutdown, maintenance, and unknown issues. Following submittal of the semiannual report, Dicastal completed a more detailed review of the temperature excursions. A summary of this review is attached. Dicastal believes that many of the 3-hour block averages during which the thermal oxidizer did not meet the minimum temperature of 725°C are likely a result of the calculation methodology used to determine the 3 hour block average temperature. The Data Acquisition and Handling System (DAHS) is not excluding all times during which chips are not being processed. For example, during startup, the interlock should not allow chips to feed until 725°C is reached; once 725°C has been reached, the chips start feeding; however, it appears that the DAHS is including all of the time the thermal oxidizer is coming up to temperature in that