



10 September 2015

Ms. Kerry Kelly
Michigan Department of Environmental Quality
Air Quality Division
7953 Adobe Road
Kalamazoo, MI 49009-5025

Re: Umicore Automotive Catalysts, SRN N7864
Letter of Violation dated 27 August 2015

Dear Ms. Kelly:

This letter is in response to the Letter of Violation (LOV) issued to Umicore Automotive Catalysts (Umicore) on 27 August 2015.

Following are the responses and corrections made to address the issues raised in the LOV.

Finding: The Violation Notice given to Umicore Autocat in Auburn Hills, Michigan states, "during this inspection, it was noted that Umicore Automotive Catalysts had installed and commenced operation of an unpermitted burner-based exhaust generation unit at this facility". The burner-based catalyst aging cell is classified in the LOV as unpermitted combustion equipment. The unit was previously exempt under Rule 285 as an "internal combustion engine that has less than 10,000,000 BTU per hour maximum heat input".

Explanation: Umicore had been utilizing internal combustion engines in the test cell but found that they could generate the same types of exhaust parameters for testing catalysts using a gasoline/diesel fired burner. The burner is cheaper to maintain and operate so in February of 2011, Umicore replaced the internal combustion engine with a burner in the test cell in question. Although the burner is not an internal combustion engine, the emissions generated by the burner mimic those generated by an internal combustion engine; therefore, Umicore did not conduct an air permit applicability analysis because no change in emissions was expected. Additionally, the burner fuel usage capacity essentially limits the burner to less than a 10,000,000 BTU per hour heat input, which is what the exemption was based on.

Resolution: Umicore has contracted with an environmental consultant, Environmental Resources Management, to prepare a Permit to Install for the burner-based catalyst aging unit. The Permit to Install will be submitted to the Michigan Department of Environmental Quality, Air Quality Division no later than 30 September 2015.



In order to avoid unpermitted equipment at this facility in the future, Umicore has implemented an environmental review of all the proposed changes to equipment or process operating parameters to determine permit applicability before the changes are made.

If you have any questions or would like to further discuss these issues, please feel free to contact me at 248-292-2240. Thank you for your consideration to the resolution of these matters.

Sincerely,

A handwritten signature in black ink, appearing to read "Brandy Werner". The signature is fluid and cursive, with the first letter of each name being significantly larger and more stylized.

Brandy Werner
E&H Specialist

cc: Brandy Werner, E&H Specialist, Umicore Automotive Catalysts
Matt Kwiatkowski, Environmental Resources Management
Andrea Reigler, Environmental Resources Management