



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



DAN WYANT
DIRECTOR

January 30, 2014

Mr. Brett Cutshall
Omega Castings Inc.
301 Fritz Keiper Blvd.
Battle Creek, Michigan 49015

SRN: N7968, Calhoun County

Dear Mr. Cutshall:

VIOLATION NOTICE

On December 23, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received correspondence dated December 19, 2013, from Omega Castings regarding a notice only change to Permit to Install (PTI) No. 294-08. Omega Castings stated that they had replaced an old dust collector with a more efficient collector for the Viking Shot Blaster, and replaced the EU-001 resinated core machine with a new replacement-in-kind unit. Per Section B (Regulatory Discussion) of this correspondence, Omega Castings references Rule 285(b), and states that it allows for replacement-in-kind for emission units and their control devices. Replacement of the dust collector on the Viking Shot Blaster with more efficient air pollution control equipment is exempt from Rule 201, PTI requirements, per Rule 285(d). Installation of a new emission unit is specifically prohibited under Rule 285(b); therefore, Omega Castings is in violation of Rule 201 for replacement of EU-001 with a new emission unit as described in the following table:

Process Description	Rule/Permit Condition Violated	Comments
EU-001 (Resinated Sand Core Machine)	Rule 201/PTI No. 294-08	Existing core machine was replaced by a new emission unit that does not meet the requirements of Rule 285(b) (i.e., "Changes in a process or process equipment <u>which do not involve installing, constructing, or reconstructing an emission unit</u> (emphasis added)").

Based on a review of the December 19, 2013, correspondence the AQD has determined that Omega Castings has installed and/or commenced operation of an unpermitted process/equipment. The AQD staff advised Mr. Cutshall on January 29, 2014, that this is a violation of Rule 201 of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

A program for compliance may include a completed PTI application for the EU-001 process equipment. An application form is available by request or at the following website:
http://www.deq.state.mi.us/aps/nsr_information.shtml#AUP

Mr. Brett Cutshall
Page 2
January 30, 2014

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.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 20, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Omega Castings 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 cited violation. If you have any questions regarding the cited violation or the actions necessary to bring Omega Castings into compliance, please contact me at the telephone number listed below.

Sincerely,



Rex I. Lane
Senior Environmental Quality Analyst
Air Quality Division
269-567-3547

RIL:CF

cc: Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ