



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 6, 2020

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

SRN: N6013, Oakland County

Dear Mr. Buchner:

VIOLATION NOTICE

On January 31, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted reviews of Continental Aluminum's FG-RV2 retest stack test report (sampled during October 29-30, 2019; AST Project No. 2019-1472), the permit and other records. Continental Aluminum is located at 29201 Milford Road, New Hudson, Michigan. The purpose of this stack test review was to determine Continental Aluminum'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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number PTI No. 504-96F.

During the stack test review (FG-RV2 retest stack report sampled during October 29-30, 2019; AST Project No. 2019-1472), and other records reviews, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-RV2	PTI No. 504-96F dated September 27, 2013, FGRV2 (EURV2PROCHTR plus EURV2MELT), SC I.4 limit: 1.4 pounds of PM2.5 per hour.	Continental exceeded the PM2.5 limit of 1.4 pounds of PM2.5 per hour. ^β
FG-RV2	PTI No. 504-96F dated September 27, 2013, FGRV2 (EURV2PROCHTR plus EURV2MELT), SC IV.3 and Appendix A, continuous opacity monitoring system (COMS), 1-8	Continental failed to meet COMS requirements.

^β As Continental exceeded the PM2.5 limit during July 2019 stack test (2.3 and 0.6 pounds per hour for baghouse and flue stacks, respectively), it repeated the stack test during October 29-30, 2019. As stated in the permit (EURV2PROCHTR plus EURV2MELT), combined separately (flue plus baghouse stacks) sampled emissions are 1.7 pounds of PM2.5 per hour.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by **February 27, 2020** (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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Ct., Warren, Michigan 48092-2793 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Continental Aluminum 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 violation cited above and for the cooperation that was extended to me during my inspection of Continental Aluminum. If you have any questions regarding the violation 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
konanahalli@michigan.gov or 586-753-3741

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE
Ms. Regina Angellotti, EGLE
Mr. Mark Dziadosz, EGLE