STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL COMMISSION

ALTERATION OF STIPULATION FOR ENTRY OF CONSENT ORDER AND FINAL ORDER APC No. 06-1980 AND RATIFICATION THEREOF

The Air Pollution Control Commission, Department of Natural Resources, State of Michigan, and Central Foundry Division, General Motors Corporation, a company doing business at the Saginaw Malleable Iron Plant in the City of Saginaw, County of Saginaw, State of Michigan, both being parties to Consent Order No. 06-1980, dated June 3, 1980, hereby ratify and consent to the following alteration of such Consent Order:

I. Paragraph 7.F, Oil Quench Facilities, shall be revised to read as follows:

F. OIL QUENCH FACILITIES

(1) By the effective date of this Order, the Company shall initiate a testing and evaluation program to develop a reliable control method or methods for bringing the oil quench facilities into compliance with the Commission's rules. At the end of each calendar quarter, the Company shall submit to Staff a written progress report identifying the control options under evaluation, the methods being used to evaluate these options, and a summary of the results of these evaluations.

(2) By ~~January 1, 1981,~~ MAY 1, 1982, the Company shall submit to the Staff a plan for limiting visible emissions from the oil quench facilities to 20 percent opacity or less, except as specified in R 336.1301(1)(a) and (b) of

the Commission's rules. This plan shall stipulate the technique to be used and a time schedule for accomplishing the following as expeditiously as practical.

(a) When the Company will submit to the Staff, pursuant to the Commission's rules, plans and specifications and an application for an installation permit describing the air pollution control device(s) and/or other equipment to be used to limit visible emissions from the oil quench facilities to 20 percent opacity or less, except as specified in R 336.1301(1)(a) and (b) of the Commission's rules.

(b) When (after receiving the installation permit referred to in paragraph 7.F(2)(a), above) the Company will have placed an order with the manufacturer for the purchase of the air pollution control device(s) and/or other equipment referred to in paragraph 7.F(2)(a), above.

(c) When (after receiving the installation permit referred to in paragraph 7.F(2)(a), above) the Company will begin on-site installation of said air pollution control device(s) and/or other equipment referred to in paragraphs 7.F(2)(a) and (b), above, and notify the Staff in writing that this installation has begun.

(d) When the Company will have placed in operation said air pollution control device(s) and/or other equipment referred to in paragraphs 7.F(2)(a), (b), and (c), above, and notify the Staff in writing that the device(s) and/or equipment have been placed in operation.

-~~(e)~~(3) After the date specified in paragraph 7.F(2)(d), above, but not later than ~~December 31, 1982,~~DECEMBER 15, 1983, visible emissions from the NOS. 1 AND 2 DIRECT oil quench AND NOS. 1, 2, AND 3 HARDEN QUENCH AND DRAW facilities shall ~~not exceed 20 percent opacity, except as specified in R 336.1301(1)(a) and (b) of the Commission's rules~~ COMPLY WITH R 336.1301.

(4) AFTER JANUARY 1, 1982, THE PARTICULATE EMISSIONS FROM NOS. 1, 2, AND 3 DIRECT OIL QUENCH FACILITIES SHALL NOT EXCEED 0.10 POUNDS OF PARTICULATE PER 1,000 POUNDS OF EXHAUST GASES.

(5) AFTER JANUARY 1, 1982, AND UNTIL DECEMBER 15, 1983, THE PARTICULATE EMISSIONS FROM NOS. 1, 2, AND 3 HARDEN, QUENCH AND DRAW FACILITIES SHALL NOT EXCEED 0.16 POUNDS OF PARTICULATE PER 1,000 POUNDS OF EXHAUST GASES.

(6) AFTER DECEMBER 15, 1983, THE PARTICULATE EMISSIONS FROM NOS. 1, 2, AND 3 HARDEN, QUENCH AND DRAW FACILITIES SHALL NOT EXCEED 0.10 POUNDS OF PARTICULATE PER 1,000 POUNDS OF EXHAUST GASES.

(7) AFTER THE EFFECTIVE DATE OF THE ALTERATION OF THIS ORDER, THE COMPANY SHALL NOT OPERATE NOS. 9 NOR 10 HARDEN, QUENCH AND DRAW FACILITIES, EXCEPT AS PROVIDED IN PERMIT TO INSTALL NO. 191-82.

II. Paragraph 8 shall be deleted and replaced by the following paragraph:

8. ~~The Company and the Staff agree that no particulate emission limit existed for the induction furnaces prior to November 21, 1978.~~

THE COMPANY AND THE STAFF AGREE THAT THE PARTICULATE EMISSION LIMIT SPECIFIED IN PARAGRAPH 7.A(5) IS MORE STRINGENT THAN ANY PRIOR PARTICULATE EMISSION LIMIT SPECIFIED IN R 336.1331 OF THE COMMISSION'S RULES THAT MAY HAVE BEEN APPLICABLE TO THE INDUCTION FURNACES.

Staff and the Company both acknowledge that a public hearing on the alteration of this abatement program was held on June 15, 1982. Both the Company and the

Commission agree to be bound by the terms of the Consent Order, as altered, in the same manner as if such alteration had been made before the execution thereof.

Executed this 13 day of July, 1982, by Central Foundry Division, General Motors Corporation.

GENERAL MOTORS CORPORATION
CENTRAL FOUNDRY DIVISION

By: _____
Plant Manager
Central Foundry Division-Saginaw

Executed this 22d day of July, 1982, and contents approved as to form by the Department of Attorney General of the State of Michigan.

ENVIRONMENTAL PROTECTION DIVISION
DEPARTMENT OF ATTORNEY GENERAL

By: _____

Executed this 30 day of July, 1982, and contents approved as to substance by the Department of Natural Resources of the State of Michigan.

AIR POLLUTION CONTROL COMMISSION
DEPARTMENT OF NATURAL RESOURCES

By: Robert Miller

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL COMMISSION

In the matter of administrative proceedings concerning GENERAL MOTORS CORPORATION, CENTRAL FOUNDRY DIVISION, a corporation organized under the laws of the State of Delaware and doing business at the Saginaw Malleable Iron Plant, City of Saginaw, County of Saginaw, State of Michigan.	APC No. 06-1980

STIPULATION FOR ENTRY OF CONSENT ORDER
AND
FINAL ORDER

This proceeding resulted from allegations by the staff of the Air Quality Division of the Department of Natural Resources (hereinafter referred to as the "Staff"). The Staff alleges that General Motors Corporation, Central Foundry Division, a Delaware corporation (hereinafter referred to as the "Company"), doing business at the Saginaw Malleable Iron Plant (hereinafter referred to as the "Plant"), City of Saginaw, County of Saginaw, State of Michigan, is emitting particulate matter that contributes to ambient suspended particulate concentrations in excess of the Secondary National Ambient Air Quality Standard. The Company and the Staff hereby agree to the termination of this proceeding by entry of a Final Order by consent.

The Company and the Staff stipulate and agree as follows:

1. The Company and the Staff agree that the Chief of the Air Quality Division of the Department of Natural Resources is authorized by resolution of the Michigan Air Pollution Control Commission (hereinafter referred to as the "Commission") adopted June 28, 1977, as agent of the Commission to enter into this Final Order by consent.

2. The Company and the Staff agree that the Chief of the Air Quality Division of the Department of Natural Resources is charged with the investigation and enforcement

of all orders, regulations, rules, standards and statutes of the State of Michigan concerning the emission and control of air contaminants.

3. The Company and the Staff acknowledge that the Plant is located in an area that the United States Environmental Protection Agency has classified as nonattainment for the secondary particulate standard in accordance with Section 107 of the Federal Clean Air Act as amended in 1977.

4. The Company and the Staff agree that reductions of particulate matter from the Plant would facilitate the attainment of the Secondary National Ambient Air Quality Standard for particulates within the area presently classified as nonattainment.

5. The Company and the Staff acknowledge that this agreement and Final Order shall be submitted to the United States Environmental Protection Agency as part of the Michigan State Implementation Plan (SIP) revisions in accordance with Part D, Section 171, et seq. of the Federal Clean Air Act as amended in 1977.

6. The Company and the Staff stipulate that the termination of this matter by a Final Order to be entered as a Consent Order is proper and acceptable.

7. The Company and the Staff agree that the signing of this Stipulation is for settlement purposes only and does not constitute an admission by the Company that the law has been violated. However, both Staff and the Company agree that the particulate emissions from the following processes at the Plant shall be abated in accordance with the following schedule:

A. INDUCTION MELTING FURNACES

(1) By the effective date of this Order, the Company shall have submitted to the Staff plans and specifications and an application for an installation permit describing the air pollution control device(s) and/or other equipment to be used to limit the particulate emissions from each induction furnace to 6.3 pounds

per hour and limit the visible emissions from the induction furnaces to 20 percent opacity or less, except as specified in R 336.1301(1)(a) and (b) of the Commission's rules.

(2) After the effective date of this Order and upon receiving the installation permit referred to in paragraph 7.A(1), above, the Company shall have placed an order with the manufacturer for the purchase of the air pollution control device(s) and/or other equipment referred to in paragraph 7.A(1), above.

(3) Within fifteen (15) days after receiving the installation permit referred to in paragraph 7.A(1), above, the Company shall begin on-site installation of said air pollution control device(s) and/or other equipment referred to in paragraphs 7.A(1) and (2), above, and notify the Staff in writing that this installation has begun.

(4) By November 1, 1981, the Company shall have placed in operation said air pollution control device(s) and/or other equipment referred to in paragraphs 7.A(1), (2), and (3), above, and notify the Staff in writing that the device(s) and/or equipment have been placed in operation.

(5) After November 15, 1981, the particulate emissions from each induction furnace shall not exceed 6.3 pounds per hour.

(6) After November 15, 1981, visible emissions from each induction furnace shall not exceed 20 percent opacity, except as specified in R 336.1301(1)(a) and (b) of the Commission's rules.

(7) By February 1, 1982, the Company shall test (conducted according to procedures approved by Staff) said air pollution control device(s) and/or other equipment referred to in paragraphs 7.A(1), (2), (3), and (4), above, and submit to the Staff the detailed report of the test data and results.

B. CHARGE PREHEATER AFTERBURNERS

After the effective date of this order, visible emissions from the charge preheater afterburners shall not exceed 20 percent opacity, except as specified in R 336.1301(1)(a) and (b) of the Commission's rules.

C. SAND BIN DUST COLLECTORS

By the effective date of this Order, the Company shall have completed the installation of platforms or other structures for the purpose of providing access for adequate inspection and maintenance of the following Sand Bin vent baghouses:

(1) Core department.

(a) Juniata sand bin.

(b) Hemlock sand bin.

(c) Lake sand bin.

(2) Shell department.

(a) Juniata sand bin.

(b) Hemlock sand bin.

D. SHELL MULLER AND HOT BOX MULLER

(1) By January 1, 1981, the Company shall submit to the Staff, pursuant to the Commission's rules, plans and specifications and an application for an installation permit describing the air pollution control device(s) and/or other equipment to be used to limit the particulate emissions from the shell muller and hot box muller to 0.10 pounds of particulate per 1,000 pounds of exhaust gases.

(2) By March 1, 1981, and after receiving the installation permit referred to in paragraph 7.D(1), above, the Company shall have placed an order with the manufacturer for the purchase of the air pollution control device(s) and/or other equipment referred to in paragraph 7.D(1), above.

(3) By June 1, 1981, and after receiving the installation permit referred to in paragraph 7.D(1), above, the Company shall begin on-site installation of said air pollution control device(s) and/or other equipment referred to in paragraphs 7.D(1) and (2), above, and notify Staff in writing that this installation has begun.

(4) By September 1, 1981, the Company shall have placed in operation said air pollution control device(s) and/or other equipment referred to in paragraphs 7.D(1), (2), and (3), above, and notify the Staff in writing that the device(s) and/or other equipment have been placed in operation.

(5) After September 1, 1981, the particulate emissions from the shell muller and from the hot box muller shall not exceed 0.10 pounds of particulate per 1,000 pounds of exhaust gases.

(6) After September 1, 1981, visible emissions from the shell muller and from the hot box muller shall not exceed 20 percent opacity except as specified in R 336.1301(1)(a) and (b), of the Commission's rules.

E. SHELL SHAKEOUT CASTING OSCILLATOR

(1) By the effective date of this Order, the Company shall submit to the Staff, pursuant to the Commission's rules, plans and specifications and an application for an installation permit describing the air pollution control device(s) and/or other equipment to reduce the particulate emissions from the shell shakeout casting oscillator to 0.10 pounds of particulate per 1,000 pounds of exhaust gases.

(2) By the effective date of this Order, and after receiving the installation permit referred to in paragraph 7.E(1), above, the Company shall have placed an order with the manufacturer for the purchase of the air pollution control device(s) and/or other equipment referred to in paragraph 7.E(1), above.

(3) By August 1, 1980, and after receiving the installation permit referred to in paragraph 7.E(1), above, the Company shall begin onsite installation of said air pollution control device(s) and/or other equipment referred to in paragraphs 7.E(1) and (2), above, and notify Staff in writing that this installation has begun.

(4) By September 1, 1980, the Company shall have placed in operation said air pollution control device(s) and/or other equipment referred to in paragraphs 7.E(1), (2), and (3), above, and notify the Staff in writing that the device(s) and/or equipment have been placed in operation.

(5) After September 1, 1980, the particulate emissions from the shell shakeout casting oscillator shall not exceed 0.10 pounds of particulate per 1,000 pounds of exhaust gases.

F. OIL QUENCH FACILITIES

(1) By the effective date of this Order, the Company shall initiate a testing and evaluation program to develop a reliable control method or methods for bringing the oil quench facilities into compliance with the Commission's rules. At the end of each calendar quarter, the Company shall submit to Staff a written progress report identifying the control options under evaluation, the methods being used to evaluate these options, and a summary of the results of these evaluations.

(2) By January 1, 1981, the Company shall submit to the Staff a plan for limiting visible emissions from the oil quench facilities to 20 percent opacity or less, except as specified in R 336.1301(1)(a) and (b) of the Commission's rules. This plan shall stipulate the technique to be used and a time schedule for accomplishing the following as expeditiously as practical.

(a) When the Company will submit to the Staff, pursuant to the Commission's rules, plans and specifications and an application for an installation permit describing the air pollution control device(s) and/or other equipment to be used to limit visible emissions from the oil quench facilities to 20 percent opacity or less, except as specified in R 336.1301(1)(a) and (b) of the Commission's rules.

(b) When (after receiving the installation permit referred to in paragraph 7.F(2)(a), above) the Company will have placed an order with the manufacturer for the purchase of the air pollution control device(s) and/or other equipment referred to in paragraph 7.F(2)(a), above.

(c) When (after receiving the installation permit referred to in paragraph 7.F(2)(a), above) the Company will begin on-site installation of said air pollution control device(s) and/or other equipment referred to in paragraphs 7.F(2)(a) and (b), above, and notify the Staff in writing that this installation has begun.

(d) When the Company will have placed in operation said air pollution control device(s) and/or other equipment referred to in paragraphs 7.F(2)(a), (b), and (c), above, and notify the Staff in writing that the device(s) and/or equipment have been placed in operation.

(e) After the date specified in paragraph 7.F(2)(d), above, but not later than December 31, 1982, visible emissions from the oil quench facilities shall not exceed 20 percent opacity, except as specified in R 336.1301(1)(a) and (b) of the Commission's rules.

G. SHELL MOLD COOLING TUNNEL

(1) By the effective date of this Order, the Company shall submit to the Staff, pursuant to the Commission's rules, plans and specifications and an application

for an installation permit describing the air pollution control device(s) and/or other equipment to be used to limit the visible emissions from the shell mold cooling tunnel to 20 percent opacity or less, except as specified in R 336.1301(1)(a) and (b) of the Commission's rules.

(2) By the effective date of this Order, and after receiving the installation permit referred to in paragraph 7.G(1), above, the Company shall have placed an order with the manufacturer for the purchase of the air pollution control device(s) and/or other equipment referred to in paragraph 7.G(1), above.

(3) By the effective date of this Order, and after receiving the installation permit referred to in paragraph 7.G(1), above, the Company shall begin on-site installation of said air pollution control device(s) and/or other equipment referred to in paragraphs 7.G(1) and (2), above, and notify the Staff in writing that the installation has begun.

(4) By the effective date of this Order, the Company shall have placed in operation said air pollution control device(s) and/or other equipment referred to in paragraphs 7.G(1), (2), and (3), above, and notify the Staff in writing that the device(s) and/or other equipment have been placed in operation.

(5) After the effective date of this Order, visible emissions from the shell mold cooling tunnel shall not exceed 20 percent opacity, except as specified in R 336.1301(1)(a) and (b) of the Commission's rules.

H. MAIN ENTRANCE ROAD

After the effective date of this Order, the Company shall provide for the cleaning of the paved portion of the Plant's main entrance road at least twice per month, except when weather conditions make such cleaning impracticable.

I. UNPAVED ROADWAYS AND PARKING LOTS, AND MATERIAL STORAGE PILES

(1) By June 1, 1980, the Company shall apply suitable dust suppressants to the following plant property areas so as to control fugitive dust emissions.

(a) Unpaved roadways.

(b) Unpaved parking lots.

(c) Unpaved, untraveled ground areas.

(d) Granular material storage piles.

(2) Within two weeks of the dust suppressant application referred to in paragraph 7.I(1), above, and at least once every two weeks thereafter, the Company shall inspect the specified areas referred to in paragraph 7.I(1), above, to assess the effectiveness of the dust suppressant and to judge the need for further applications. If additional dust suppressant applications are judged necessary, the Company shall make such applications within a reasonable time. The Company shall continue these biweekly inspections as necessary to develop the basis for the plan required by paragraph 7.I(3), below.

(3) By January 1, 1981, the Company shall submit to Staff for review and approval a final plan for regular application of a suitable dust suppressant to the plant properties referred to in paragraph 7.I(1),above. This plan shall specify the dust suppressant material to be applied and the application frequency for each of the plant property areas specified in paragraph 7.I(1), above.

(4) By February 1, 1981, the Staff shall review the plan referred to in paragraph 7.I(3) and, if in the opinion of the Staff the plan does not carry out the objectives of Paragraph 7.I(1), the Staff may recommend changes to the plan, which must be stated in writing and supported with reasons, and require the preparation of an amended plan within 30 days following receipt by the Company of the Staff's written reasons. Within the 30-day period following receipt of the Staff's reasons, the Company shall either complete an amended plan which addresses the Staff's recommendations and/or request a hearing before the Commission for the purpose of challenging the Staff's recommenda-

tions. The Company shall implement the plan within 60 days after final review by the Staff or the Commission.

J. INSPECTION AND MAINTENANCE

(1) After the effective date of this Order, the Company shall have available at the Plant malfunction abatement plans to prevent, detect, and correct malfunctions and equipment failures of the charge preheater afterburners, the sand bin dust collectors, and the pneumatic sand delivery systems to maintain compliance with the Commission's rules. The malfunction abatement plans shall be in writing and shall, as a minimum, specify the following:

(a) A complete preventative maintenance program, including a computerized schedule for the inspection, maintenance, and repair of air cleaning devices; a description of the items or conditions that will be inspected or repaired; and an identification of the major replacement parts which will be normally maintained in the inventory for quick replacement.

(b) An identification of the source and air cleaning device operating parameters that will be monitored in order to detect a malfunction or failure; the normal operating range of these parameters; and a description of the method of monitoring or surveillance procedures.

(c) A description of the corrective procedures or operational changes that will be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

(2) Within 30 days after the availability of the plans identified in paragraph 7.J(1), the Staff shall review the plans and, if in the opinion of the Staff the plans do not carry out the objectives of paragraph 7.J(1), the Staff may recommend changes to the plans, which must be stated in writing and supported with reasons, and require the preparation of amended plans within 30 days following

receipt by the Company of the Staff's written reasons. Within the 30-day period following receipt of the Staff's reasons, the Company shall either complete amended plans which address the Staff's recommendations and/or request a hearing before the Commission for the purpose of challenging the Staff's recommendations. The Company shall implement the plans within 60 days after final review by the Staff or the Commission.

K. ROOF

(1) After the effective date of this Order, the Company shall have available at the Plant a plan to prevent, detect, and remove accumulations of granular materials on all of the Plant roofs so as to control fugitive dust emissions. This plan shall be in writing and shall as a minimum specify the following:

(a) A complete preventative maintenance program, including a computerized schedule of inspections, maintenance and removal of any accumulated granular material on the roof.

(b) A specific inspection criteria for identifying whether granular material removal procedures are needed.

(c) A description of the granular material removal procedures that will be taken.

(d) A time limit criteria for completion of any granular material removal procedures that are found to be needed.

(2) Within 30 days of the availability of the plan identified in paragraph 7.K(1), the Staff shall review the plan and, if in the opinion of the Staff the plan does not carry out the objectives of paragraph 7.K(1), above, the Staff may recommend changes to the plan, which must be stated in writing and supported with reasons, and require the preparation of an amended plan within 30 days following receipt by the Company of the Staff's written reasons. Within the

30-day period following receipt of the Staff's reasons, the Company shall either complete an amended plan which addresses the Staff's recommendations and/or request a hearing before the Commission for the purpose of challenging the Staff's recommendations. The Company shall implement the plan within 60 days after final reveiw by the Staff or the Commission.

8. The Company and the Staff agree that no particulate emission limit existed for the induction furnaces prior to November 21, 1978.

9. The Company and the Staff agree that neither the entry of this Order nor anything contained in this Order shall preclude the Company from requesting that emission reductions, in whole or in part, accomplished pursuant to this Order in excess of those necessary to demonstrate attainment of the Secondary National Ambient Air Quality Standard, be available to the Company as emission offsets.

10. The Staff and the Company do not regard this abatement program as a variance subject to the 12-month limitation specified in Section 22 of the Air Pollution Act, being MCLA 336.32. Approval of this abatement program is not a major state action for purposes of further environmental review pursuant to Executive Order 1974-4.

11. The Company and the Staff both acknowledge that a public hearing on this abatement program was held on May 5, 1980. Both the Company and the Staff consent to enforcement of this Stipulation and Final Order in the same manner and by the same procedures for all final orders entered pursuant to Section 16 of 1972 PA 257, MCLA 336.26, including enforcement pursuant to 1970 PA 127, MCLA 691.1201 et. seq.; MSA 14.528(201) et. seq.

Approved as to Form and Content:

John R. Tracy

CENTRAL FOUNDRY DIVISION
GENERAL MOTORS CORPORATION

Dated: May 29, 1980

Approved as to Content:

Delbert Rector

Delbert Rector, Chief
AIR QUALITY DIVISION
DEPARTMENT OF NATURAL RESOURCES

Dated: June 3, 1980

Approved as to Form:

Stewart H. Freeman

Stewart H. Freeman
Assistant Attorney General
DEPARTMENT OF ATTORNEY GENERAL

Dated: June 2, 1980

FINAL ORDER

This Commission having had opportunity to review the above stated Stipulation for Entry of Consent Order, and this Commission having authorized the Chief of the Air Quality Division of the Department of Natural Resources as agent of the Commission to enter into consent orders,

IT IS ORDERED that this Consent Order shall be entered in the record of this Commission as stated herein.

AIR POLLUTION CONTROL COMMISSION

By: Delbert Rector

Delbert Rector, Chief
Air Quality Division
Department of Natural Resources

Dated: June 3, 1980