#### DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Scheduled Inspection

A889240248				
FACILITY: GLOBAL TITANIL	JM INC	SRN / ID: A8892		
LOCATION: 19300 FILER, D	ETROIT	DISTRICT: Detroit		
CITY: DETROIT		COUNTY: WAYNE		
CONTACT: Adam Perry , Vic	e President of Operations	ACTIVITY DATE: 06/08/2017		
STAFF: Todd Zynda	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR		
SUBJECT: Scheduled Inspec	ction			
RESOLVED COMPLAINTS:				

PURPOSE OF INSPECTION: Targeted

INSPECTED BY: Todd Zynda (AQD), Jerry Krawiec (AQD)

PERSONNEL PRESENT: Robert L. Swenson, President; Ron Vickers, Environmental Manager; Adam Perry, Vice President of Operations; Keith Berger, Safety Manager; Robert Bruckman, Vice President Engineering and Quality

FACILITY PHONE NUMBER: (313) 366-5300 FAX: 313-366-5305 WEBSITE: www.globaltitanium.com

# FACILITY BACKGROUND

Global Titanium, Inc. (GTI) located at 19300 Filer Avenue, Detroit, Michigan, is a titanium processing and distribution facility. GTI processes all types of titanium scrap, melts, analyzes and processes ferrotitanium, screens and segregates titanium sponge, and produces titanium hydride-dehydride (HDH) powder. The facility has 140 employees and operates 24 hours a day, five days a week (a sixth day is possible as needed). The facility operates equipment under Wayne County Installation Permit (WCIP) C-2313 and C-11750.

GTI operates the following equipment and associated controls as listed in Table 1.

Table 1						
Location	Equipment	Control	PTI Exemption	Permit		
Wash Building 1	Metal chip dryer	Rotoclone wet dust collection	NA	WCIP C-2313		
Wash Building 1	CT-1 Crusher shearing titanium turnings	Wet process, emissions released to general in- plant environment	R 336.1285(2)(l)(vi)(B)	NA		
Wash Building 1	Wastewater treatment	Emissions released to general in-plant environment	R 336.1285(2)(m)(i)	NA		
Wash Building 2	Titanium dryer	Venturi wet scrubber				
Wash Building 2	CT-1 Crusher shearing titanium turnings	Wet process, emissions released to general in- plant environment	R 336.1285(2)(l)(vi)(B)	NA		
Melt Shop	Kue Ken 90 Crusher	TRI-MER				
Melt Shop	Two induction type furnaces	Baghouse dust collection system	NA	WCIP C-11750		
Melt Shop	Drying oven (400,000 Btu/hr	None	R 336.1281(2)(e)	NA		
Melt Shop		NA	R 336.1285(2)(g)	NA		

	Emergency Generator - 66 KW - natural gas			
Torch Cutting Building	Torch cutting	Baghouse dust collection system	R 336.1285(2)(l)(vi)(C)	NA
Torch Cutting Area	Metal Shredder	None		
Warehouse 4	Shot blasting	Dust collection system	R 336.1285(2)(l)(vi)(C)	NA
Warehouse 4	Welding	Emissions released to general in-plant environment	R 336.1285(2)(i)	NA
Warehouse 5	Briquetting Machines	Emissions released to general in-plant environment	R336.1285(2)(l)(i)	NA
TICO Building	Kue Ken 55 Crusher	TRI-MER		
TICO Building	Roll Crusher	TRI-MER		
TICO Building	Cobble Crusher (shearing process)	Wet process, emissions released to general in- plant environment	R 336.1285(2)(l)(vi)(B)	NA
HDH Building	Granulater	TRI MER, emissions released to general in- plant environment		
HDH Building	Rod Mill Crusher	TRI MER, emissions released to general in- plant environment		
HDH Building	HDH furnaces	closed system, any emissions to the general in-plant environment		
HDH Building	Pressurized Hydrogen Storage Tank(s)	NA	R336.1284(2)(j)	NA

# COMPLAINT HISTORY

Since 2008, there have been 20 complaints regarding odors and/or opacity from GTI. On September 20, 2016 a violation notice was issued for violation of R 336.1901(b) regarding burnt metal odors downwind of the facility. GTI believes that the odor and/or opacity were originating from either the Wash Building 1 or Wash Building 2 scrubber stacks. As a result, on June 19, 2017, GTI has installed a new fan on the Wash Building 2 venturi scrubber. GTI believes that new fan will increase the scrubber efficiency by increasing the pressure drop across the venturi scrubber throat. Correspondence dated April 3, 2017 indicates that results of the fan installation will be evaluated before making further investment in Wash Building 1. During a meeting on June 27, 2017, GTI indicated that the scrubber performance and fine tuning is in progress. According to Mr. Adam Perry, Vice President of Operations, there is already an increase in the amount of material collected by the scrubber at Wash Building 2. On July 3, 2017 a letter dated June 30, 2017 reaffirmed the information provided during the June 27, 2017 meeting.

# OUTSTANDING CONSENT ORDERS

None

# **INSPECTION NARRATIVE**

On June 8, 2017 the MDEQ Air Quality Division (AQD) inspectors Mr. Todd Zynda and Mr. Jerry Krawiec conducted an inspection of Global Titanium located at 19300 Filer, Detroit, Michigan. During the June 8, 2017 inspection Mr. Ron Vickers, Environmental Manager and Mr. Robert Swenson, President, provided information and tour of facility operations. During a follow up inspection of the facility on June 27, 2017, Mr. Adam Perry, Vice President of Operations, Mr. Keith Berger, Safety Manager, and Mr. Robert Bruckman, Vice President Engineering and Quality provide information and additional tour of the facility.

The inspections were conducted to determine the facility's compliance with the Natural Resources and Environmental Protection Act (NREPA), Act 451, Part 55, and Wayne County Installation Permit C-2313 and C-11750.

During the inspection on June 8, 2017, the records request was discussed with Mr. Vickers and Mr. Swenson. At this time GTI was provided with 40 CFR Part 63, Subpart YYYYY – National Emission Standards for Hazardous Air Pollutants for Area Sources: Ferroalloys Production Facilities. According to Mr. Swenson, GTI is not subject to the regulation. It was explained that the AQD does not have the delegated authority for Subpart YYYYY, and that the regulation was provided for informational purposes only.

According to Mr. Swenson and Mr. Vickers, the facility does not operate any boilers or cold cleaners.

The inspection of the facility began with observation Warehouse 1, which is used for shipping and receiving and storage.

Following observation of Warehouse 1, the torch cutting building was observed. Within in the torch cutting building, scrap material is sized for furnace melting. Emissions from torch cutting are vented to a baghouse (15,000 cfm MICROPUL dry dust collector). During the inspection on June 8, 2017, the pressure drop gauge for the torch cutting baghouse could not be located. During the follow up inspection on June 27, 2017 the pressure drop gauge was located inside the torch cutting building. At that time the pressure drop read 6.0 inches water. According to GTI, the operating pressure drop range for the torch cutting baghouse is 0 to 10 inches water. During the inspection on June 8, 2017, there was pulsing opacity from the torch cutting baghouse stack. The opacity pulse occurred approximately every minute and lasted approximately 10 seconds. During the follow up visit on June 27, 2017, Mr. Perry stated that the pulsing torch cutting baghouse has been fixed. According to Mr. Perry, the bags were replaced on May 23, 2017 and following the AQD inspection on June 8, it was identified that a "bag dropped" and the repair was promptly made on June 12, 2017.

Adjacent to the torch cutting building is a metal shredder. Any potential emissions are uncontrolled to ambient air.

Following observation of the torch cutting building, the steel shot blaster unit was observed in Warehouse 4. Emissions from the steel shot blaster unit (Wheelabrator) are controlled by a baghouse (1500 cfm ACT cartridge-type dry dust collector). According to the facility map provided on June 27, 2017 Warehouse 4 also houses a welding area.

Following observation of Warehouse 4, the melt shop and associated baghouse was observed. Emissions from the ferrotitanium induction-type furnaces are controlled via baghouse (40,000 cfm DUSTAR dry dust collector). During the inspection, the baghouse pressure gauge read 0.8 inches water. According to GTI, the operating pressure drop range for the torch cutting bag house is 0 to 10 inches water. GTI records the pressure drop once per shift. The temperature is measured using a probe every five heats per furnace. Temperature and raw material records were provided during the June 27, 2017 meeting. Within the melt shop, GTI operates a titanium crusher (Kue Ken 90 Jaw Crusher) which is vented to wet dust collection system (TRI-MER, 1500 cfm).

Following observation of the melt shop, the MG Blends Building was observed. This building houses blended material to be melted. The MG Blends Building also has a 400,000 Btu per hour drying oven. According to Mr. Vickers the drying oven is used only drying clean wet material. The drying oven is not used as a burn off oven.

Following observation of the MG Blends Building, Wash Building 2 was observed. The process in Wash Building 2 begins with the shearing (the company uses the term crushing, but is more of a shearing process) of titanium turnings (CT-2). The shearing is a wet process, with any potential emissions released to the general in-plant environment. The cut turnings are then washed (soap based solution) through a screw conveyor. Following the wash, the turnings enter a centrifuge to spin off water and reclaim soap. Following the centrifuge, a rinse stage

is completed using a rinse auger, followed by another centrifuge to spin off excess water. The cleaned turnings then enter a dryer (2.5 MMBtu per hour). Emissions from the drying of the turnings are controlled by a venturi scrubber. During the inspection the scrubber flow rates read 7.5 gallons per minute (gpm) and 5.0 gpm. As described above under Complaint History, the venture scrubber recently had a new fan installed, which was observed during the June 27, 2017 facility visit. The turnings are then sized using screens and magnets are used to pull out any magnetic material (iron).

Following observation of Wash Building 2, Wash Building 1 was observed. Similar to Wash Building 2, the process begins with the shearing of titanium turnings (CT-1). The shearing is a wet process, with any potential emissions released to the general in-plant environment. The washing of the turnings operates in a similar fashion as Wash Building 2 (wash, centrifuge, rinse, centrifuge, and dryer), with a slightly different set up and older emissions control. The metal chip dryer with cyclone (rotoclone) wet dust collection was permitted by WCIP C-2313 and was certified on September 7, 1972. WCIP C-2313 was issued to Frankel Company Inc. (Frankel). GTI purchased Frankel in 1996.

Following observation of Wash Building 2, the HDH Building was observed. Observation of the HDH building began with powders processing area. Powders are processed using "Granulater" controlled by TRI-MER wet dust collection and "Rod Mill Crusher" controlled by AER Control System wet dust collection system. Both units vent to the general in-plant environment. Following the powders process area, the HDH furnaces were observed. According to Mr. Vickers the process is completely enclosed with no emissions venting to outside ambient air. GTI operates 4 electric HDH furnaces (2 small - 4,000 lb capacity, 2 large – 10,000 lb capacity). The process uses hydrogen to make titanium brittle enough to be crushed. The titanium is then crushed (in powders processing area) into a fine powder and then the hydrogen is removed under vacuum. The hydrogen storage tanks are located on the trailer beds adjacent to the south of the HDH building.

Following observation of the HDH Building, TICO Building was observed. The TICO Building houses the Kue Ken 55 Crusher with associated dust collection (TRI MER) and Roll Crusher with associated dust collection (TRI MER). Both TRI-MER units vent to outside ambient air. Adjacent to the TICO Building is Maintenance Building 1. Within Maintenance Building 1 there is a "cobble crusher" that vents to the general in-plant environment. According to the facility, the "cobble crusher" operates in the same manner as CT-1 and CT-2 and more of a shearing process.

Following observation of the TICO and Maintenance Building 1, Warehouse 4 was observed. Warehouse Building 4 houses two briquetting machines, that hydraulically press titanium fines to hockey puck size briquettes. Any emissions from this process are released to the general in-plant environment.

The tour of the facility concluded with observation of the "Church" and Perch Buildings and Maintenance Building 2. Within these areas, a fork lift storage area, fabricating and maintenance area, small packaging and screening operations were observed. Any emissions from the packaging and screening area are released to the general inplant environment.

On July 24, 2017, the 66 KW natural gas fired emergency generator was observed. The engine is equipped with an hour meter that read 209 hours. According to information provided the engine was installed in September 2010 (manufactured date of June 2010).

On September 14, 2017, GTI's consultant, Bruce Bawkon – ASTI, provided an email indicating the exemption GTI is claiming for the metal shredder and the way forward on how GTI will calculate emissions for R 336.1290 records for the titanium dryer at Wash Building 2 and the Kue Ken Crusher and Roll Crusher located at the TICO building. After review of the email, the AQD disagrees with GTI's assessment that the metal shredder is exempt under R 336.1285(2)(I)(vi)(A). Based on the description provided in the email, the shredder is operated 3 days per week (approximately 24 hours per week) and material is transported to furnaces for melting. Because the metal that is shredded is used in the furnace, this is not consider "nonproduction". Additionally, the email provided includes proposed calculations to demonstrate that emissions meet R 336.1290. However, records are not provided. At this time, it is unknown if emissions from the titanium dryer, Kue Ken 55 and Roll Crusher qualify for the R 336.1290 exemption. A violation notice will be issued for the failure to obtain a permit to install for the metal crusher, titanium dryer, Kue Ken 55 and Roll Crusher.

# APPLICABLE RULES/PERMIT CONDITIONS

# Wayne County Installation Permit C-2313: Metal Chip Dryer

There are no special conditions associated with C-2313.

# Wayne County Installation Permit C-11750: Two Ferrotitanium Induction-Type Furnaces with Associated Baghouse Dust Collection System

SC 17. **COMPLIANCE**. Exhaust gases from furnaces shall be discharged, unobstructed, vertically upwards from a stack having a maximum diameter of 30 inches at an exit point not less than 40 feet above ground level. During the inspection the stack for the baghouse servicing the melt shop furnaces appeared to meet these requirements. Measurements were not collected.

SC 18. **COMPLIANCE**. Visible emissions from the furnaces shall not exceed 20 percent opacity. During the inspection there no visible emissions from the melt shop baghouse.

SC 19. **COMPLIANCE**. Shall not operate furnaces unless the baghouse-type particulate collection system is installed and operating properly. Shall maintain and operate pressure differential gauges on the baghouse in order to measure pressure drop across particulate collection. The gauges shall be equipped with a device that indicates the occurrence of pressure drops outside of the normal operating range.

During the inspection on June 8, 2017 the baghouse appeared to be installed and operating properly. During the inspection, the baghouse pressure gauge read 0.8 inches water. According to GTI, the operating pressure drop range for the torch cutting bag house is 0 to 10 inches water. GTI records the pressure drop once per shift. The facility also provided pressure drop records from May 16, 2017 through June 12, 2017. Records indicate that the baghouse has operated between 0.6 to 3.3 inches water.

SC 20. **NOT EVALUATED**. The disposal of collected air contaminants shall be performed in a manner which minimizes the introduction of contaminants to the outside air. During the inspection disposal of material collected by dust collection systems was not observed.

SC 21 and 27. **UNKNOWN**. The maximum allowable particulate emissions from the furnaces shall not exceed 0.01 pounds of particulate per 1,000 pounds exhaust gas, nor 0.87 pounds per hour. Verification of particulate matter emission rates by testing, at owner's expense, may be requested. The AQD does not have information to evaluate compliance with this condition. At this time testing has not been requested.

SC 22, 23, and 24. **COMPLIANCE**. Shall only charge the furnaces with clean, dry scrap. Shall not charge the furnaces with pure nickel or chromium. Shall not use any fluxing material. During the inspection, it appeared that only clean, dry scrap was used. According to the facility, pure nickel or chromium is not used. The facility does not use any fluxing material.

SC 25. **NOT IN COMPLIANCE**. The maximum temperature in the furnaces shall not exceed 2,700 °F, with an allowable variance of 5 percent. According to GTI, the temperature of each furnace is measured every 5 heats per furnace. Recorded furnace temperatures were provided for May 2, 2017 through May 30, 2017. A five percent variance equates to 2835°F. According to records provided, the furnace temperature was exceeded 17 times at Furnace 1 (17/75 = 23% operating time) and 18 times at Furnace 2 (18/76 = 24% operating time).

SC 26. **COMPLIANCE**. Shall record the amount and types of raw materials processed in the furnaces on a monthly basis. Shall record the hours of operation of each of the furnaces. The facility maintains records satisfying these requirements.

#### Federal Requirements

#### <u>40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal</u> <u>Combustion Engines</u>

According to information provided the engine was installed in September 2010 (manufactured date of June 2010). The specification sheet indicates a maximum power of 66.4 KW (89 horse power).

60.4233(d) and 60.4233(e), 40 CFR Part 60, Subpart JJJJ, Table 1 - Owner/operator must comply with emission standards specified in this subpart. **COMPLIANCE**. The facility provided a USEPA Certificate of Conformity for the engine.

40 CFR 60.4243(a)(2)(ii)) – **COMPLIANCE** -To the extent practicable, must maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. The facility appears to meet this requirement.

40 CFR 60.4243(d) – **COMPLIANCE** - The emergency engine may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of the emergency engine in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operating, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited.

During the inspection on July 24, 2017, the hour meter read 209 hours. The engine was installed in September 2010. This equals to approximately 30 hours per year.

40 CFR 60.4243(e)) – **COMPLIANCE** -Owners and operators of stationary SI natural gas fired engines may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of § 60.4233.

The engine is equipped with propane as a backup fuel. Emissions for firing propane are certified.

40 CFR 60.4237(b) – **COMPLIANCE** - Shall not operate the generator unless it is equipped with a functional non -resettable hour meter. The engine is equipped with a non-resettable hour meter.

40 CFR 60.4245(a) - COMPLIANCE - The permittee must keep records as outlined below.

- a. All notifications submitted to comply with 40 CFR Part 60, Subpart JJJJ and all documentation supporting any notification.
- b. Maintenance conducted on the engine.
- c. If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.
- d. If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to § 60.4243(a)(2), documentation that the engine meets the emission standards.

The emergency engine appears to meet the above requirements. The Certificate of Conformity, emissions data, and maintenance records were provided via email on August 21, 2017.

## 40 CFR Part 63, Subpart ZZZ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Per 40 CFR 63.6590(c) and (c)(1), the emergency generator need only comply with the requirements of 40 CFR Part 60, Subpart JJJJ in order to satisfy the requirements of 40 CFR Part 63, Subpart ZZZ.

## <u>40 CFR Part 63, Subpart YYYYY - National Emission Standards for Hazardous Air Pollutants for Area</u> <u>Sources: Ferroalloys Production Facilities</u>

The facility states that they are not subject to Subpart YYYYYY. The AQD is not the delegated authority for this regulation. Therefore, an evaluation was not conducted.

# PERMIT TO INSTALL EXEMPT EQUIPMENT

## Wastewater Treatment – Wash Building 1

The wastewater treatment equipment at the facility is exempt from PTI requirements under the following Rule.

R336.1285(2)(m)(i): "The requirement to obtain a PTI does not apply lagoons and equipment primarily designed to treat volatile organic compounds in process water, wastewater, or groundwater, unless emissions from the lagoons and equipment are released to the general in-plant environment."

#### **Drying Oven – Melt Shop**

The melt shop drying oven (400,000 Btu per hour) appears to be exempt from PTI requirements under the following Rule.

R336.1281(2)(e): "The requirement to obtain a PTI does not apply to equipment used for washing or drying materials, where the material itself cannot become an air contaminant, if no volatile organic compounds that have a vapor pressure greater than 0.1 millimeter of mercury at standard conditions are used in the process and no oil or solid fuel is burned."

## Emergency Engine - Melt Shop

The emergency engine appears to be exempt from PTI requirements under the following Rule.

R336.1285(2)(g): "The requirement to obtain a PTI does not apply to internal combustion engines that less than 10,000,000 Btu/ hour maximum heat input."

The engine specification sheet provided indicates a fuel consumption rate at 100% load of 744 cubic feet per hour (cfh), which equates to 781,200 BTU/hr (744 cfh x 1,050 BTU/cf).

## Stationary Torch Cutting with Baghouse

The stationary torch cutting operation with baghouse control appears to be exempt from PTI requirements under the following Rule.

R336.1285(2)(I)(vi)(C): "The requirement to obtain a PTI does not apply to the following equipment and any exhaust system or collector exclusively serving...equipment for...cutting...metals...equipment has externally vented emissions controlled by appropriately design and operated fabric filter."

In a letter dated November 13, 2003, the attached purchase order for the baghouse indicates that the baghouse is equipped with a "spark arrestance plenum with (30) removable baffle filters". This appears to meet the requirement of a "mechanical precleaner".

#### Shot Blasting with Dust Collection - Warehouse 4

The shot blasting unit (Wheelabrator) with baghouse control appears to be exempt from PTI requirements under the following Rule.

R336.1285(2)(I)(vi)(C): "The requirement to obtain a PTI does not apply to the following equipment and any exhaust system or collector exclusively serving...equipment for...shot blasting...metals...equipment has externally vented emissions controlled by appropriately design and operated fabric filter."

The dust collection system for shot blasting operations is an ACT cartridge type dry dust collector (1500 cfm). According to the ACT website, for blasting operations, the ACT blasting dust collectors are equipped with "abrasion resistant plenums" which appears to meet the requirement of a "mechanical precleaner".

#### Welding – Warehouse 4

The welding operations in Warehouse 4 appears to be exempt from PTI requirements under the following Rule.

R336.1285(2)(i): "The requirement to obtain a PTI does not apply to brazing, soldering, welding, or plasma coating equipment".

## **Briquetting Machines – Warehouse 5**

The briquetting operations in Warehouse 4 appear to be exempt from PTI requirements under the following Rule.

R336.1285(2)(I)(i): "The requirement to obtain a PTI does not apply to the following equipment and any exhaust system or collector exclusively serving equipment used exclusively for bending, forming, expanding, rolling, forging, pressing, drawing, stamping, spinning, or extruding either hot or cold metals."

#### Pressurized Hydrogen Storage Tanks - HDH

The pressurized hydrogen storage tanks associated with HDH operations appears to be exempt from PTI requirements under the following Rule.

R336.1284(2)(j): "The requirement to obtain a PTI does not apply to pressurized storage of ... hydrogen."

#### CT-1 (Wash Building 1), CT-2 (Wash Building 2), and Cobble Crusher (TICO Building)

The CT-1 (Wash Building 1), CT-2 (Wash Building 2), and Cobble Crusher (TICO Building) appear to be exempt from PTI requirements under the following Rule.

R336.1285(2)(I)(vi)(B): "The requirement to obtain a PTI does not apply to the following equipment and any exhaust system or collector exclusively serving...equipment for...cutting...metals...equipment that has emissions that are released only into the general in-plant environment."

## APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS

Not Applicable. All lots are paved.

## MAERS

The facility is currently not required to submit MAERS.

## FINAL COMPLIANCE DETERMINATION:

The facility is not in compliance with C-11750, SC 25 as described above. Additionally, it is unknown if the titanium dryer in Wash Building 2, the Kue Ken 55 and Roll Crusher located in the TICO Building, and the Kue Ken 90 in the Melt Shop are PTI exempt equipment. A violation notice will be issued for C-11750, SC 25 and for failing to obtain a permit to install for the metal shredder, titanium dryer and crushers (Kue Ken 55, Kue Ken 90, and Roll Crusher).

NAME

SUPERVISOR