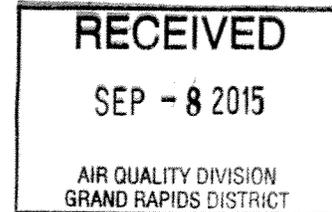


A Division of Ervin Industries, Inc.

915 Tabor Street  
Adrian, Michigan 49221  
(517) 265-6118  
FAX (517) 265-5636



September 2, 2015



Eric Grinstern  
Environmental Quality Specialist  
MDEQ - AQD  
Grand Rapids District Office  
350 Ottawa Ave, N.W  
Unit 10  
Grand Rapids, MI 49503

Mr. Grinstern:

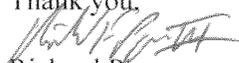
On 8/14/15 Ervin Amasteel Adrian received a violation notice from an inspection conducted on 6/8/15. In the notice there were four citations identified corrective action and response.

1. EU0004 - Reviewed with management that if a dust collector has a failure and is subsequently shut down, the associated emission unit cannot be ran to an alternative control device without a PTI. The impeller for the control device associated with EU0004 has been replaced, restarted and ran to date without any further failures. Additionally a PTI to move the associated emission unit from the control device to another has been completed, and the work planned for mid-2016.

Reviewed/Retrained on ISO 14001 procedure (based on R.O.P. requirements) with management and maintenance personnel for proper action to be taken when readings are out of tolerance.

2. EU0007 – Reviewed/Retrained on ISO 14001 procedure (based on R.O.P. requirements) with management and maintenance personnel for proper action to be taken when readings are out of tolerance.
3. EU0005 – Reviewed/Retrained on ISO 14001 procedure (based on R.O.P. requirements) with management and maintenance personnel for proper action to be taken when readings are out of tolerance.

We trust that the information presented for the cited items will address/meet the State of Michigan's expectations.

Thank you,  
  
Richard Payne  
Plant Engineer

Encl.: (7)

cc: Jim Lemon  
File

**Environmental Management System  
Non-Conformance & Corrective & Preventive Action Report**

Non-Conformance # 080715-4 (EMR, only)

\*  Observation, only (for non-permitted activities, only)

Permit:  Yes      No      If yes, Permit No. M1-ROP-B1754-2013

Date Occurred: Nov 14<sup>th</sup> 2014      Time Occurred: 8:30 ish AM/PM

Duration: Nov 14<sup>th</sup> - Jan 27<sup>th</sup> 2015      Excursion Type: Operation of emission unit without baghouse control

Excursion Description: AAF (EU004) impeller failed Nov 14<sup>th</sup> and collector was shut down, however shot forming continued without collection, emissions were released into melt shop.

Immediate Action Taken: Impeller sent out for repair, contacted state of Michigan for an emergency P.T.I. to re-route emissions to a different collector.

Cause for Excursion: Failed impeller, dust collector shut down.

Action Taken to Prevent Reoccurrence: Emission will be re-routed to main dust collector (2016) EU0009.

Procedure/Work Instruction/Form revised as a result post emergency review? YES or  NO

Which Procedure/Work Instruction/Form revised? N/A

C/A Submitted by: <u>Paul F. Pitzer</u>	Date: <u>8/27/15</u>
C/A Accepted by: <u>Paul F. Pitzer</u>	Date: <u>8/27/15</u>
C/A Verified by: <u>[Signature]</u>	Date: <u>8/27/15</u>

**Environmental Management System  
Non-Conformance & Corrective & Preventive Action Report**

Non-Conformance # 082715-3 (EMR, only)

\*  Observation, only (for non-permitted activities, only)

Permit:  Yes      No      If yes, Permit No. M1-ELF-131754-2013

Date Occurred: Feb 27<sup>th</sup> / March 11<sup>th</sup> 2015 Time Occurred: unknown AM/PM

Duration: 1 day (+ hrs) Excursion Type: Monitoring, observation

Excursion Description: Pressure drop across trays exceeded limits and no safety readings were taken, no action.

Immediate Action Taken: Notify supervisor and write non-conformance.

Cause for Excursion: Procedure not allowed for action taken if tolerance exceeded.

Action Taken to Prevent Reoccurrence: Conduct training/review on all related procedures.

Procedure/Work Instruction/Form revised as a result post emergency review? YES or  NO

Which Procedure/Work Instruction/Form revised? \_\_\_\_\_

C/A Submitted by: <u>[Signature]</u>	Date: <u>8/27/15</u>
C/A Accepted by: <u>[Signature]</u>	Date: <u>8/27/15</u>
C/A Verified by: <u>[Signature]</u>	Date: <u>8/21/15</u>

Ervin Industries, Inc.

Employee Training List  
Group Sessions

Work Location Melting

Date 8-27-15

Training Subject 4.4.6-13 WI Review

Trainer \_\_\_\_\_

\*Adrian only -- Time Started: \_\_\_\_\_ End Time: \_\_\_\_\_ Total Time: \_\_\_\_\_

Names of employees Attending:

D. Elliott      Doug Elliott

T. Knisel      Troy Knisel

M. Sinks      ~~Matt Sinks~~

Bryan Hilton      Bryan Hilton

Don Bundy      Don Bundy

G. Hutchinson      G. Hutch

D. Thomas      Duane Thomas

**Environmental Management System  
Non-Conformance & Corrective & Preventive Action Report**

Non-Conformance # 080715-1 (EMR, only)

\*      Observation, only (for non-permitted activities, only)

Permit: Yes No If yes, Permit No. MI-ROP-131754-2013

Date Occurred: 4/17/15 Time Occurred: Unknown AM / PM

Duration: couple months Excursion Type: Monitoring/observation

Excursion Description: from April 17<sup>th</sup> through June 25 2015 the  
majority of the pressure drop readings were below the  
low limit of 1.0" w.c. and no opacity readings are noted.

Immediate Action Taken: Notified supervisor and wrote non-conformance.

Cause for Excursion: Proper NOTIFICATION NOT given  
when readings were outside limits.

Action Taken to Prevent Reoccurrence: Review 4.5.3-1P

Procedure/Work Instruction/Form revised as a result post emergency review? YES or NO

Which Procedure/Work Instruction/Form revised? \_\_\_\_\_

C/A Submitted by: [Signature] Date: 8/27/15

C/A Accepted by: [Signature] Date: 9-1-15

C/A Verified by: [Signature] Date: 9/2/15

Ervin Industries, Inc.

Employee Training List  
Group Sessions

Work Location: Ervin, Adrian

Date: 9-1-15

Traning Subject: Review 4.5.3-1P of 14001

Trainer: D. McBean

\*Adrian only: Time started: \_\_\_\_\_ End Time: \_\_\_\_\_ Total Time: .25

Names of employees attending:

- Darren McBean 
- T. Popejoy 
- T. Nix 
- D. Thompson 
- K. Serin 
  
- M. Gallippo 
- T. O'Quinn jr. 

**Environmental Management System  
Non-Conformance & Corrective & Preventive Action Report**

Non-Conformance # 082715-2 (EMR, only)

\*      Observation, only (for non-permitted activities, only)

Permit: Yes No If yes, Permit No. M1-ROP-B1754-2013

Date Occurred: 11/24/14 Time Occurred: unknown AM / PM

Duration: cycle metrics Excursion Type: Monitoring / observation

Excursion Description: from Nov 24<sup>th</sup> 2014 to Feb 10<sup>th</sup> 2015 there are multiple occasions where readings were below lower limit 1.5"

Immediate Action Taken: Notified supervisor and wrote non-conformance

Cause for Excursion: Proper Notification NOT given when readings were outside limits.

Action Taken to Prevent Reoccurrence: Review 4.5.3-1P

Procedure/Work Instruction/Form revised as a result post emergency review? YES or NO

Which Procedure/Work Instruction/Form revised? \_\_\_\_\_

C/A Submitted by: <u>[Signature]</u>	Date: <u>8/27/15</u>
C/A Accepted by: <u>[Signature]</u>	Date: <u>9-1-15</u>
C/A Verified by: <u>[Signature]</u>	Date: <u>9/2/15</u>

