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POURING/COOLING BAGHOUSE INTEGRATED PLAN
OPERATIONS & MAINTENANCE PLAN (O&M)
INSPECTIONS
PREVENTATIVE MAINTENANCE PLAN (PMP)
SITE SPECIFIC MONITORING FOR BAG LEAK DETECTION
CORRECTIVE ACTION PLAN (CAP)
MALFUNCTION ABATEMENT PLAN (MAP)
STARTUP, SHUTDOWN, AND MALFUNCTION (SSM)

BREMBO NORTH AMERICA FOUNDRY
HOMER, MICHIGAN

PREPARED BY

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1.0 INTRODUCTION

The Brembo North America, Inc. foundry, located in Homer, Michigan (Homer Foundry) will operate and maintain the facility, including air pollution capture, collection, control and monitoring systems, in a manner consistent with good air pollution control practices for minimizing emissions as presented in this integrated plan. [40 CFR §63.6(e)(1)(i)]

1.1 Applicability

[Permit to Install (PTI), §63.6, §63.7710, and R336.1911]

This integrated plan has been prepared to comply with the applicable requirements of:

- Permit to Install (PTI) No. 199-14C
- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories
 - 40 CFR Part 63 Subpart A General Provisions
 - 40 CFR Part 63 Subpart EEEEE (NESHAP 5E) for Iron and Steel Foundries
- Michigan Department of Environmental, Great Lakes, and Energy (EGLE) Rules (R336.1911-1912)

The applicable sections and plan location are presented on Table 1, below.

Table 1: Regulatory Applicability and Plan Location

Citation 40 CFR Part	Regulations NESHAP Subpart EEEEE (5E) Description	Plan Location	
		Section	Appendix
§63.6	Applicable sections referenced throughout plan	[2]	[2]
§63.6(e)(3)	Startup, Shutdown, Malfunction (SSM)	6	D
§63.8	Monitoring requirements as applicable to monitor	3.3, 4.3	-
§63.10	Monitor recordkeeping requirements; SSM reporting requirements	7.3	-
§63.7700	Work Practice Standards	[1]	-
§63.7710(b)	Written Operation and maintenance plan	[2]	[2]
§63.7710(b)(1)	Monthly inspections	3.3	-
§63.7710(b)(3)	Preventative maintenance plan (PMP)	3.0	B
§63.7710(b)(4)	Site-specific monitoring (SSM) for Baghouse Leak Detection System	4.3	-
§63.7710(b)(5)	Corrective action plan (CAP)	5.0	-
§63.7710(b)(6)	Ignition source to mold vents	[1]	-
§63.7720(b)	Startup, Shutdown, Malfunction Plan (SSMP) per 63.6(e)(3)	6.0	-
§63.7736(b),(c),(d)	Certified that submitted plan and operate and maintain the plan	8.0	-
§63.7740(b),(c)	Monitoring requirements BLDS	3.0, 4.3	A
§63.7741(b)	Requirements for BLDS	4.0	-
§63.7743(c)	BH inspections maintained	3.0, 7.0	-
§63.7746	Deviations and reporting	7.0	-
§63.7751-52	Reports and Records	7.0	C
MDEQ R336	Emission Limitations and Prohibitions - Misc	Section	Appendix
R336.1910	Control system installed, maintained, and operated in satisfactory manner and in accordance with rules	[2]	-
R336.1911(1)	MAP prepared to prevent, detect, correct malfunctions or equipment failures	[2]	-
R336.1911(2)(a)	PMP prepared and updated Inspection performed List of replacement parts maintained and inventory	3.0	B
R336.1911(2)(b)	Operating variables to be monitored to detect malfunctions; normal range; monitoring program	3,0, 4.0	-
R336.1911(2)(c)	Description of corrective action or operation changes in event of malfunction or failure to achieve compliance	5.0	-
R336.1912	Excess emissions reporting requirements	7.0	-

[1]Prepared as separate document

[2]General applicability

2.0 SOURCE DESCRIPTION

The emission source, air pollution control equipment, and affected emissions from the facility are detailed within the PTI and include:

Table 2: Emission Unit, Control Device, and Pollutants

Emission Units	Capture, Collection and Control	NESHAP 5E Limits	Permit Limits
FGPOURCOOL: EUPOURING EUCOOLING	One pouring station in which molten metal is introduced the molds; after which, molds are conveyed to the cooling house, a fully enclosed process. Emissions from pouring and cooling are controlled by the Pouring/Cooling Baghouse*.	PM: 0.002 gr/dscf or Metal HAP: 0.0002 gr/dscf	PM: 0.88 pph, 2.24 tpy PM10: 1.71 pph, 4.33 tpy PM2.5: 1.51 pph, 3.83 tpy

* Prior to passing through the RTO, which is addressed in its own Integrated Plan.

2.1 Emission Unit, Control System, and Monitor Description

The emissions from the pouring station and cooling house are controlled by the Pouring/Cooling Baghouse. The baghouse is equipped with an ASCO 1-1/2" valves w/solenoids purpose to clean the bags from excessive dust build up. A CPM 750 emission monitor is installed in the common stack to monitor the relative changes in particulate concentrations that would be indicative of a malfunction (e.g., bag break). Appendix A provides a summary of operating ranges for the system.

3.0 PREVENTATIVE MAINTENANCE PROGRAM

This preventative maintenance program identifies the personnel responsible for the program, equipment inspections, and preventative maintenance.

3.1 Responsible Personnel

[R336.1911(2)(a)]

The personnel responsible for this integrated plan are listed in Table 3.

Table 3: Personnel Responsible for Integrated Plan

Position*	Responsibility
Plant Manager	Overall Operations and Maintenance
Maintenance / Engineering Manager	Training, maintaining plan
Environmental Manager	Reporting to EGLE, verifying requirements
Maintenance technician	Preventative maintenance inspections, repairs, and spare parts inventory

Notes: * Or equivalent.

3.2 Equipment Operations

Proper equipment operation must be verified and maintained on a regular basis in an effort to meet emission requirements. Proper operation may include:

- Fans running
- Static pressure sensor for fan within range
- Dampers online and at proper setting
- Hopper sensors working and in range
- Screw conveyors in AUTO mode unless manually set
- Zero speed sensors operational
- Slide gates operational
- Discharge chute level sensor within operating range
- Compressed air pressure within operating range
- Differential pressure module within operating range
- Pulsing sequence “ON”
- Thermocouples within operating range
- CPM 750 emission monitor(s) within operating range
- Stack flow monitor within range

The equipment presents a high health and safety hazard to personnel and precautions must be observed during maintenance and servicing operations. The following provisions must be observed prior to accessing or servicing the emission equipment:

- All system motors should be locked out. This must be completed through the installation of specific lockout/tagout hardware onto the electrical service disconnect. Removal of said hardware shall not be conducted until installation or maintenance is complete.
- Lockout-Tagout/Electrical Safety - all system motors must be LOTO prior to any servicing and installation. This must be completed through the installation of specific LOTO hardware onto the electrical service disconnect. LOTO removal shall not be conducted until installation or maintenance is completed.
- Confined Space - some dust collection area are classified as Non-Permit/Permit Required Confined Spaces due to physical and chemical hazards associated with the area. Follow onsite Confined Space procedure prior to entry - entry team, air monitoring, rescue team and rescue equipment may be required.
- Working at Height - some installation/repair work may require personnel to work from height. Follow Safe Ladder Use, Aerial Work Platform and Fall Protection procedures.
- Handling and Lifting - heavy dust collector parts may present a safety hazard to anyone handling them or others in the area if they are dropped. To avoid injuries always follow instructions on proper lifting mechanics.

3.3 Equipment Inspections and Maintenance

[§63.8(d), §63.7710(b)(1) and (3), §63.7740(c), R336.1911(2)(a)]

Preventative maintenance is a key component to ensuring the reliability, availability, efficiency, and production at the facility. Routine maintenance and inspection of the equipment will be conducted in accordance with the manufacturer's written maintenance instructions and maintenance schedule, and applicable regulatory requirements, as presented on Table 4 below. All maintenance work performed will be documented in either hard copy or electronic format and kept for a minimum of five (5) years from the date of the maintenance activity.

A summary of the equipment inspection and preventative maintenance schedule for critical equipment relating to the capture and collection, emission control unit, and monitoring systems is presented on Table 4. The frequency and scope of these inspections depend on manufacturer recommendations. The maintenance department maintains an electronic version of the up-to-date and most accurate inspection and preventative maintenance requirements.

The following is an equipment inspection and maintenance schedule for critical equipment relating to the emission control units:

Table 4: Equipment Inspection and Maintenance Schedule

Item	Inspection/Maintenance Action	Weekly	Monthly	Semi-Annual	Annual
1	Visual check of HMI for system faults and system status	x			
2	Check for air leaks	x			
3	Listen for pulse valve diaphragm leaks	x			
4	Listen for unusual noises, smells, temps, etc.	x			
5	Visual check oil leaks	x			
6	Check compressed air regulators and filters	x			
7	Grease screw conveyor bearing and seals	x			
8	Verify compressed air pressures and drain compressed air		x		
9	Verify pneumatic transport convey air pressure		x		
10	Visual check tube sheet		x		
11	Pulse valves working when activated		x		
12	Level probes working		x		
13	Emission monitor inspected and cleaned		x		
14	Check level of oil in gearboxes		x		
15	Verify air knife pressure for emission monitor		x		
16	Inspect pneumatic transport dome valve		x		
17	Grease discharge conveyor bearings		x		
18	Visalite bag house			x	
19	Grease and oil change in SEW drive				x
20	Have fan motors and bearings analyzed				x
21	Visually inspect the integrity of ductwork/ stack/ duct supports				x
22	Excessive oil leaks by equipment should be investigated and fixed. Refill oil and grease at the time.				x
23	Flow monitor calibration				x
24	Monitor pressure drop across each baghouse cell to ensure pressure drop is within the normal operating range identified in the manual.	DCS			
25	Visual inspection of hoppers to confirm dust is being removed	x			
26	Monitor cleaning cycles to ensure proper operation	x			
27	Check bag cleaning mechanisms for proper functioning		x		
28	Visual inspection bag tension to ensure that bags are not kinked (knead or bent) or lying on their sides.		x		
29	Visual inspection to confirm the integrity of the baghouse interior for air leaks			x	
30	Visual inspection, or use of vibration detectors, of fans for wear, material buildup, and corrosion			x	
31	Vibration analysis to check for wear on motors and gear boxes[1]			x	
CPM 750 Monitor					
32	Monitor inspected and cleaned				x
33	Check the operation of the CPM 750. Verify that the control is displaying a monitor value	DCS			
34	Check the window value. Compare the value to previously noted window values. If the window value is approaching the Low Window Value Set Point, perform the service procedure		x		
35	Check the operation of the purge air system		x		
36	Visually inspect the transmitter head and receiver head housings to verify that no portion is loose or distorted		x		
Notes:	DCS = distributed control system (effectively a Daily task).				
	[1] Revision Dec 2018				

3.4 Equipment Spare Parts

[§63.8(c)(1)(i), §63.7710(b)(5), R336.1911 (2)(a)]

The ability to quickly replace components which malfunction during operations largely depends on three factors:

- The availability of off-site sources for replacement parts,
- The willingness of the source to shut down while waiting for such parts, and
- The ability to replace parts without the necessity of a shutdown.

In an effort to minimize potential equipment downtime, an inventory of spare parts for the baghouse control systems and monitor must be maintained onsite. A summary of the spare parts maintained onsite as recommended by the manufacturer is included in Appendix B. A comprehensive up-to-date list is maintained in electronic format in the maintenance department.

4.0 OPERATING VARIABLES TO BE MONITORED

Routine monitoring and collection of operating data is an integral part of equipment operation and necessary to maintaining the equipment operation as per the requirements of the PTI.

4.1 Baghouse Operating Variables

Baghouse operating variables that are monitored are included on the specification sheet in Appendix A. An example includes:

- Differential pressure module (high differential pressure alarm) – Monitors the differential pressure across the bags. Information used to determine when to clean down the collector and is available on the DCS.
- The baghouse system is monitored at the DCS and data will be available at all times to the operators. The list of information to be monitored should be considered as a minimum and is subject to expansion at a later date.

4.2 Bag Leak Detection System (BLDS)

[§63.7710(b)(4), §63.7740(b)]

The BLDS consists of a CPM 750 emission monitor installed on the exhaust stack of the baghouse to measure relative change in particulate concentration.

The BLDS alarm set point is identified in the on the specification sheet in Appendix A.

4.3 Site-Specific Monitoring Plan for BLDS

[§63.7710(b)(4), §63.7740(b), §63.7741(b), §63.7742, §63.8(d), R336.1911(2)(B)]

The BLDS is operated and maintained according to the site-specific monitoring plan in accordance with requirements listed below. [§63.7710(b)(4)]

- A CPM 750 is installed on the exhaust stack of the baghouse to measure relative change in particulate concentration. The movement of particles through this sensor beam causes a rapid variation in the received light intensity. The CPM 750 sensor is supplied with logarithmic output with signal to DCS.

The BLDS is integral to the operation of the baghouse system and will be functional at all time the baghouse is in operation. The system is wired to be powered when the baghouse is on.

Routine maintenance will be conducted in accordance with the manufacturer recommendations as outlined on Table 4. A summary list of spare parts, as applicable, is included in Appendix B.

Following the initial adjustment, the sensitivity or range, averaging period, or alarm set point will not be adjusted without prior approval from EGLE. However, if necessary, the sensitivity of the monitor may be adjusted to account for seasonable effects including temperature and humidity.

4.3.1 BLDS Monitor Requirements

The baghouse stack is equipped with a BLDS to monitor the relative change in PM loadings. [§63.7740(b)] The BLDS is a CPM 750 monitor that complies with the following BLDS requirements. [§63.7741(b)]

- Sensor provides output of relative PM loadings.
- DCS is equipped with alarm when increase detected over alarm set point - alarm located where it can be heard. Alarm set point provided on specification sheet in Appendix A.
- The initial baseline was established based on a percentage of output scale. The alarm was set to exceed the peaks from baghouse shakeout. Following the initial adjustment, monitor will not be reset without agency approval - except once per quarter for seasonal changes.
- The CPM 750 monitor online specifications provide concentration range 0 to 50 mg/m³.

4.3.2 CPM 750 Monitor – Data Collection Requirements

The data collection requirements to demonstrate continuous compliance include the following. [§63.7742]

- Data will be monitored on the DCS panel and continuously recorded on the Supervisory Control and Data Acquisition (SCADA) system.
- Data may not be used when recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emissions or operating levels or to fulfill a minimum data availability requirement, if applicable. Data collected during all other periods will be used for assessing compliance.

4.3.3 CPM 750 Quality Control Measures

Quality control measures for the CPM 750 monitor include the preventative maintenance activities outlined in Table 4. [§63.8(d)]

5.0 CORRECTIVE ACTION PROCEDURES

Troubleshooting procedures shall be well-documented prior to equipment activation to increase the likelihood of timely and effective repairs. Thorough completion of the troubleshooting procedures also reduces the risks of adverse operating conditions which can lead to the discharge of excess emissions. In addition, training of personnel in the typical operations and troubleshooting/repair of the equipment is essential to minimize emissions and maximize operational time.

5.1 Corrective Action Procedures

[§63.7710(b)(5), R336.1911(2)(c)]

This section presents the actions to be taken to correct (e.g. repair) the malfunctioning process, air pollution control, and air pollution monitoring equipment as soon as practical after the malfunction happens to minimize emissions. Corrective action procedures for the listed malfunction scenarios are presented below. Refer to equipment manuals for specific step-by-step instructions as needed.

5.1.1 Initial Corrective Actions

[§63.7710(b)(5)]

In the event of a BLDS alarm, corrective action to determine the cause of the alarm will be taken within 1 hour and corrective action to correct the cause of the problem will be taken within 24 hours of the alarm. The corrective action will be completed as soon as practicable. Initial corrective actions may include:

- A. Inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions. [§63.7710(b)(5)(i)]
- B. Sealing off defective bags or filter media. [§63.7710(b)(5)(ii)]
- C. Replacing defective bags or filter media or otherwise repairing the control device. [§63.7710(b)(5)(iii)]
- D. Sealing off a defective baghouse compartment. [§63.7710(b)(5)(iv)]
- E. Cleaning the BLDS probe or otherwise repairing the BLDS. [§63.7710(b)(5)(v)]
- F. Making process changes. [§63.7710(b)(5)(vi)]
- G. Shutting down the process producing the PM emissions. [§63.7710(b)(5)(vii)]

5.1.2 Broken Bags or Filter Bleed Through

Filter bag failure may result due to defects, thermal failure, mechanical failure, high differential pressure, or gradual wear. The following corrective action procedures are used when there is a malfunction resulting in excess emissions from broken filter bags or filter bleed through.

- A. Inspect for broken bags and repair or replace filter bags, as necessary.
- B. Re-establish filter cake buildup according to manufacturer specifications.
- C. If required, seal off defective bag or baghouse compartment if immediate replacement or repair cannot be made.

5.1.3 Fan or Amp Measuring System Failure

The corrective action for malfunction or excess emissions due to fan failure includes repair, replacement, or other adjustments. The following are corrective actions that may be required.

- A. Mechanism malfunction- make adjustments to the alignment or tension of fan components.
- B. Dirty equipment – clean air flow surfaces coating with excessive particulate.
- C. Fan settings – adjust fan settings, correct damper settings, or modify control settings.

5.1.4 CPM 750 Failure and/or Alarm

- A. Verify DCS - check for other monitoring parameter readings.
- B. Clean probe if correction is indicated.
- C. Check power input.

5.1.5 Cleaning Mechanism Failure or Pre-coat Faults

- A. Check cleaning mechanism for proper operation.
- B. Listen for unusual noises.
- C. Repair or replace components as necessary.
- D. Check for proper settings. If filter cake buildup is insufficient then reduce cleaning frequency; if cake buildup is excessive increase cleaning frequency.

5.2 Corrective Action Responsibilities

[§63.7710(b)(5), §63.6(e), and EGLE Rule 336.1911(2)(c)]

In the event a BLDS alarm is triggered, the following procedures will be followed.

A. Maintenance Technician

1. Contact Maintenance / Engineering Manager upon discovery of any malfunction, alarm, or abnormal startup or shutdown.
2. Determine the cause of any alarm or malfunction within 1 hour. [§63.7710(b)(5)]
3. Determine if there has been an exceedance of any emission or operating limit.

4. Initiate corrective action to correct the cause of any problem within 24 hours of the alarm or malfunction. [§63.7710(b)(5)]
5. Complete the corrective action as soon as practicable. [§63.7710(b)(5)]
6. Complete startup, shutdown, or malfunction recordkeeping per forms in Appendix D.

B. Maintenance / Engineering Manager

1. Contact Environmental Manager upon discovery of any malfunction, alarm, or abnormal startup or shutdown.
2. Verify the cause of any alarm or malfunction within 1 hour.
3. Determine if there has been an exceedance of any emission or operating limit.
4. Verify that corrective action to correct the cause of any problem within 24 hours of the alarm or malfunction.
5. Complete the corrective action as soon as practicable.
6. Complete startup, shutdown, or malfunction recordkeeping per forms in Appendix D.

C. Environmental Manager

1. Determine if there has been an exceedance of any emission or operating limit.
2. Determine if there has been a malfunction that is not included in the corrective action procedures, **Section 5.1**, above. **If a malfunction occurs that is not consistent with the listed corrective action procedures, then the problem will be logged and reported to the agency as an Immediate SSM Report, see form in Appendix D (Section 7.4.2.B).**
3. Verify that corrective actions are taken within 1 hour of alarm or malfunction and within 24 hours to correct any problem.
4. Complete the corrective action as soon as practicable.
5. Verify all recordkeeping procedures are followed.
6. Follow Startup, Shutdown, Malfunction Reporting procedures, as required.

6.0 STARTUP, SHUTDOWN AND MALFUNCTION

The startup, shutdown, and malfunction requirements are presented under regulations including: PTI General Conditions (GC) 7, 40 CFR 63.7720(b), 63.6(e)(3), EGLE Rule 336.1911.

6.1 Definitions

[40 CFR §63.2]

- **Startup** - the “setting in operation of an affected source or portion of an affected source for any purpose”.
- **Shutdown** - “the cessation of operation of an affected source or portion of an affected source for any purpose”.
- **Malfunction** - “any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions”.

6.2 Startup, Shutdown, and Malfunction (SSM)

[PTI GC 7, 40 CFR 63.7720(b), 63.6(e)(3), EGLE Rule 336.1911]

This startup, shutdown, and malfunction has been prepared to describe the procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard. This SSM does not address any scenario that would not cause the source to exceed an applicable emission limitation presented in the PTI or NESHAP 5E. The purpose of the SSM plan is to:

- Provide procedures for operating and maintaining the control system and monitoring equipment during periods of startup, shutdown, and malfunction consistent with safety and good air pollution control practices to minimize emissions;
- Ensure actions to correct malfunctions are taken as soon as practicable after their occurrence in order to minimize excess emissions; and
- Reduce the reporting burden with periods of startup, shutdown, and malfunction.

During these periods of startup, shutdown, and malfunction the control system and monitoring equipment will be operated consistent with the procedures and corrective actions of this SSM.

6.3 Typical Startup and Shutdown Procedures

[40 CFR §63.6(e)(3)]

Typical startup and shutdown will be conducted in accordance with manufacturer specifications such that excess PM emissions are minimized during the event. The following steps are followed during startup and shutdown of the control system.

Table 5: Typical Startup and Shutdown Procedures

Item	Start-up
1	Start baghouse system and monitor according to manufacturer instructions before initiating production
2	Verify baghouse system operating parameters are within range (e.g. flow rate, pre-coat, fan amperage, differential pressure)
3	Monitor operating parameters during production startup
4	Report abnormal conditions immediately
5	Initiate CPM 750 monitor per manufacturer specifications and verify readings are within operating range
Item	Shutdown
1	After production has stopped, shutdown baghouse system according to manufacturer specifications

6.4 Malfunctions

[40 CFR §63.6(e)(3)]

This list can periodically be revised as necessary to reflect operations without prior approval. However, each change must be reported in the semi-annual report. If the SSM fails to address or inadequately addresses a malfunction event, the plan must be revised within 45 days of the event to correct the deficiency. A written notice must be provided to the agency if the revision ‘alters the scope or the activities at the source which are deemed to be startup, shutdown, or malfunctions’.

Typical malfunctions are presented in Table 6 below. Corrective actions are presented in Section 5.1.

If a malfunction occurs that is not listed below, then the problem will be logged and reported to the agency as an Immediate SSM Report. Corrective action procedures are listed in Section 5.

Table 6: Possible Malfunctions

Possible Malfunctions	Typical Corrective Actions[1] See Corrective Action Procedures
Broken Bags or Filter Bleed Through	Inspecting the baghouse for leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions
Fan or Amp Measuring System Failure	
High Differential Pressure Drop and/or Alarm	Sealing off defective bags or otherwise remaining the control device
High Temperature and/or Alarm	Sealing off a defective baghouse compartment
CMP 750 Failure and/or Alarm	Cleaning the bag leak detection system probe or otherwise remaining the bag lead detection system
Cleaning Mechanism Failure or Pre-coat Faults	
Bag Damper Malfunction	Making process changes
Pulse Jet Sequencing Error	Shutting down the process producing the PM emissions
Power Failure	Check power source
Motor Failure and related components such as belts, pulleys, etc. [2]	Replace Motor with new then rebuild old [2]
Gear Box Failure [2]	Replace gear box with new then rebuild old [2]
Component and Sensor Contamination	Cleaning or Replacement
[1] Referenced from 40 CFR 63.7710(b)(5)	
[2] Revision Dec 2018	

7.0 PLAN MAINTENANCE, RECORDKEEPING AND REPORTING

7.1 Initial Plan Requirements

[PTI Condition III, R336.1911]

- The integrated plan has been submitted to the Air Quality District (AQD) for review and approval in accordance with the PTI and applicable regulations.

7.2 Plan Revisions

[PTI Condition III, R336.1911(3) and (4)]

- If at any time the SSM fails to address or inadequately addresses an event that meets the characteristics of the malfunction, the SSM / MAP shall be amended within 45 days after such an event occurs.
- The plan must be revised within 45 days, if new equipment is installed.
- The plan must be revised upon request from the AQD.
- The permittee shall submit the plan and any amendments to the plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of the submittal, the MAP or amended MAP shall be considered approved. Until amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.
- Revisions must be logged on form in Appendix C.

7.3 Record Keeping

[PTI Condition VI, §63.7752, §63.7743, §63.6, §63.8, §63.10]

The facility must maintain a copy of the initial notification as well as performance tests and evaluations. [§63.7752, §63.10(b)(2)(xiv) and (viii)]. Recordkeeping requirements to support ongoing compliance are listed in Table 7.

7.3.1 Recordkeeping Management

[PTI Condition VI, §63.7753, §63.10(b)(1)]

Records must be maintained in a form suitable and readily available for expeditious review.

- All information necessary to demonstrate compliance with each plan requirement will be kept on-site for a period of at least 5 years. [§63.6(e)(3)]
- Records will be maintained for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [63.7753, 63.10(b)(1)]

- All current plans and superseded plans for the CPM 750 will be maintained for the life of the affected source. [63.8(d)(3)]

Table 7: Recordkeeping Requirements

Recordkeeping Requirements [40 CFR §63.7743, §63.6 and §63.10]	
Files must be maintained for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record; in form suitable and readily available for expeditious inspection and review. [§63.7753, §63.10]	
§63.7743	General Recordkeeping Requirements
(2)	• Time the baghouse leak detection system sounded
(2)	• For each valid alarm, the time corrective action was taken
(2)	• Date on which corrective action was completed
§63.10(b)	General Recordkeeping Requirements
(2)(i)	• Occurrence and duration of each startup or shutdown when the event causes the source to exceed limits
(2)(ii)	• Occurrence and duration of each malfunction of operation of the required control and monitoring equipment
(2)(iii)	• All required maintenance performed on the air pollution control and monitoring equipment
(2)(iv)	• Actions taken during periods of startup, shutdown or malfunction when the source exceeded applicable emission limitations in a relevant standard and when the actions taken are different from the procedures of the SSM (see 63.6(e)(3))
(2)(v)	• All information necessary, including actions taken, to demonstrate conformance with the affected source's SSMP when all actions taken during periods of startup or shutdown and malfunction are consistent with the procedures specified in the SSM
(2)(vi)	• Each period during which a CMS is malfunctioning or inoperative (Including out-of-control periods)
(2)(vii)	• All required measurements needed to demonstrate compliance with the relevant standard
(2)(viii)	• All results of performance tests, CMS performance evaluations, and opacity and visible emission observations
(2)(ix)	• All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
(2)(x)	• All CMS calibration checks;
(2)(xi)	• All adjustments and maintenance performed on CMS;
(2)(xii)	• All emission levels relative to the criterion for obtaining permission to use an alternative to the relative accuracy test, if the source has been granted such permission under §63.8(f)(6)
(2)(xiv)	• All documentation supporting initial notifications and notifications of compliance status under §63.9.
§63.10(c)	CMS Recordkeeping requirements
(1)	• All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods)
(5)	• The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks
(6)	• The date and time identifying each period during which the CMS was out of control, as defined in §63.8(c)(7)
(7)-(8)	Not applicable
(10)	• The nature and cause of any malfunction (if known)
(11)	• The corrective action taken or preventive measures adopted
(12)	• The nature of the repairs or adjustments to the CMS that was inoperative or out of control
(13)	• The total process operating time during the reporting period
(14)	• All procedures that are part of a quality control program developed and implemented for CMS under §63.8(d)
(15)	• In order to satisfy the requirements of paragraphs (c)(10) through (c)(12) of this section and to avoid duplicative recordkeeping efforts, the owner or operator may use the affected source's SSMP or records kept to satisfy the recordkeeping requirements of the SSM specified in §63.6(e), provided that such plan and records adequately address the requirements of paragraphs (c)(10) through (c)(12)
§63.6(e)	CMS Recordkeeping requirements
(1)	• All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods)
(5)	• The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks
(6)	• The date and time identifying each period during which the CMS was out of control, as defined in §63.8(c)(7)

7.4 Malfunction Reporting Requirements

[PTI GC 7, §63.6(e)(3), R336.1912]

- Include any emission exceedance or deviation from operating requirements on semi-annual monitoring and deviation report and annual report. [40 CFR §63.10(d)(5) and EGLE Rule 336.1213(3)]

7.4.1 Excess Emissions Reporting Requirements

[40 CFR §63.6(e)(3), EGLE Rule 336.1912(3)]

Excess emissions reporting requirements according to the NESHAP 5E and EGLE are summarized in Table 8 below.

Table 8: Excess Emissions Reporting Limits

Citation	Excess Emission Duration	HAP or TAP Excess Emission Duration	Verbal Report	Written Report
	Hours	Hours	Days	Days
NESHAP 5E §63.6(e)(3)	Any (not consistent with SSM or did not follow SSM)		2	7
MDEQ R336.1912	2	1	2	10 ^[1]

[1]Written report, if required, filed within 10 days after startup or shutdown occurred, within 10 days after abnormal conditions or malfunction corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first.

7.4.2 EGLE - Excess Emissions Reporting

[PTI, EGLE Rule 336.1912(3), (4), and (5)]

A. Excess Emissions Metal HAPs

Excess emissions reporting is required for the Finish Baghouse for any abnormal condition, start-up, shutdown, or a malfunction that results in emissions of **Metal PM HAPs** continuing for more than **1 hours** in excess of a standard or limitation established by the PTI.

B. Excess Emissions PM, PM10, PM2.5

Excess emissions reporting is required for the Finish Baghouse for any abnormal condition, start-up, shutdown, or a malfunction that results in emissions of **PM, PM₁₀, PM_{2.5}** continuing for more than **2 hours** in excess of a standard or limitation established by the PTI.

Reporting requirements presented on Table 9.

7.4.3 NESHAP 5E - Excess Emissions Reporting

[PTI, 40 CFR §63.6(e)(3), §63.7751]

Excess emissions reporting under NESHAP 5E is dependent on whether it is a result of actions taken that are consistent with the SSM. Records must be maintained as follows and are only required where the Pouring/Cooling Baghouse exceeds the **PM or Metal HAPs** emission standard or limit established in the PTI or NESHAP 5E.

A. Excess Emissions Consistent with SSM

[§63.6(e)(5)(i)]

For actions taken during startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation), or malfunction (including actions taken to correct a malfunction) that are **consistent** with the procedures specified in the SSM.

- **Records** must reflect that SSM was followed; as well as including records of occurrence and duration, see list below.
 - Date and time of the startup and how long did it last
 - Date and time of the shutdown and how long did it last
 - Date and time of the malfunction and how long did it last
 - Description of the malfunctioning equipment or condition
 - Cause of the malfunctions
 - Actions taken to minimize emissions or correct malfunction
 - Determination of whether plan was followed
- **Reporting** of event must be included in semi-annual and annual report. Include any emission exceedance on semi-annual monitoring and deviation report and annual report [§63.10(d)(5) and R 336.1213(3)].

B. Excess Emissions Not Consistent with SSM – Immediate Report

[§63.6(e)(5)(ii)]

For actions taken during startup, shutdown, or malfunction (including action taken to correct a malfunction) that is **not consistent** with the procedures of the SSM, or the SSM was not followed, and the source exceeds the applicable emission limits.

- **Records** must reflect actions taken for that event and must report such actions according to the following:
- **Reporting** of event is subject to the most stringent reporting requirement listed in Table 9.
 - For each deviation from an emissions limitation (including an operating limit) or work practice standard occurring at the facility using a continuous monitoring system to comply with the emissions limitation or work practice standard, the monitoring requirements listed on Table 9 will be provided.
 - For all emissions from Pouring/Cooling Baghouse the worst-case regulatory reporting criteria is followed.
- **Reporting** of event must be included in semi-annual and annual report. Include any emission exceedance on semi-annual monitoring and deviation report and annual report [40 CFR §63.10(d)(5) and EGLE Rule 336.1213(3)].

Table 9: Excess Emissions Reporting Requirements

Regulations	MDEQ [MDEQ Rule 226.1912(2)]	NESHAP Subpart EEEEE [§63.10(5)(ii) and §63.7751]
Criteria	Excess Emissions Reporting - Metal <u>HAP and TAPs</u>	Excess Emissions Reporting - Metal <u>HAPs</u>
	Excess Emissions Episode of any air contaminant continuing for more than <u>1 hour</u> in excess of a standard or limitation. [MDEQ Rule 226.1912(2)]	For actions taken during startup, shutdown, or malfunction (including action taken to correct a malfunction) that is not consistent with the procedures of the SSMP
Initial Notification	Excess Emissions HAPs/TAPs [MDEQ Rule 226.1912(4)]	Excess Emissions HAPs not consistent with SSM
Timing	As soon as reasonable but not more than two (2) business days after discovery	As soon as reasonable but not more than two (2) business days after commencing action inconsistent with the SSMP
Method	Any reasonable means, including electronic, telephone, or oral communication	Telephone or facsimile transmission
Requirements [40 CFR §63.10(5)(ii)]	Verbal or Other Acceptable Report to Include:	
	• Name, title, and signature of responsible official certifying accuracy of report	
	• Explain circumstances of the event	
	• Describe all excess emissions and/or parameter monitoring exceedances which are believed to have occurred description and circumstances including date, duration, pollutants, and limits exceeded	
	• Description of the malfunctioning equipment or condition	
	• Corrective action taken	
• Other actions taken to minimize emissions in conformance with 63.(e)(1)(i)		
Written Report	Excess Emissions Any Contaminant [40 CFR §63.7751(b)(8) and MDEQ Rule 226.1912(5)]	
Timing	Whichever is first: • Within 10 days after start-up or shutdown occurred; • Within 10 days after abnormal conditions or malfunction has been corrected; or • Within 30 days of discovery of the abnormal conditions or malfunction, whichever	• Letter delivered and postmarked within 7 working days after the end of the event
Method	• Written Report - Requires Certification by Responsible Official (using ROP Cert Form):	• Letter - Name, title, signature - Certified by Responsible Official to accuracy
Process and Control System Requirements [Per MDEQ 336.1912 and 40 CFR §63.10(5)(ii)]	Written Report or Letter to Include:	
	• The time and date, the probable causes or reasons for, and the duration of the abnormal conditions, start-up, shutdown, or malfunction.	
	• An identification of the source, process, or process equipment that experienced abnormal conditions, was started up or shut down, or which malfunctioned and all other affected process or process equipment that have emissions in excess of an applicable requirement, including a description of the type and, where known or where it is reasonably possible to estimate, the quantity or magnitude of emissions in excess of applicable requirements.	
	• Information describing the measures taken and air pollution control practices followed to minimize emissions.	
	• For abnormal conditions and malfunctions, the report shall also include a summary of the actions taken to correct and to prevent a reoccurrence of the abnormal conditions or malfunction and the time taken to correct the malfunction.	
Monitoring Reporting Requirements [§63.7751(b)(8)]	• Reason for not following the SSMP	
	• The date and time that each malfunction started and stopped.	
	• The date and time that each continuous monitoring system was inoperative, except for zero (low-level) and high-level checks.	
	• The date, time, and duration that each continuous monitoring system was out-of-control.	
	• The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.	
	• A summary of the total duration of the deviations during the reporting period and the total duration as a percent of the total source operating time during that reporting period.	
	• A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and unknown causes.	
	• A summary of the total duration of continuous monitoring system downtime during the reporting period and the total duration of continuous monitoring system downtime as a percent of the total source operating time during the reporting	
	• A brief description of the process units.	
	• A brief description of the continuous monitoring system.	
• The date of the latest continuous monitoring system certification or audit.		
• A description of any changes in continuous monitoring systems, processes, or controls since the last reporting period.		

Appendix A
Summary of Operating Ranges

**Pouring/Cooling Baghouse
Summary of Operating Ranges**

Operating Parameter	Unit Of Measure	Normal	Max	Low / High Alarms	Sensors
Flow Rate	acfm	77,000	85,000 ^	No Alarms	In-stack pitot tubes
Fan Amperage	Amps	234	340	No Alarms	Current transformer
Pressure Drop	in H2O	5.0 - 5.5	3.0 Above Set Point	None / 3.0	dP module ...
CPM 750 (Bag Leak Detection System)*					
Particulate Concentration	Relative to Reference Concentration	5% - 165%	165%	<5% / >165% for 30 seconds	Optical / light scattering ...

Notes:

The baghouse is a "pulse" system with centrifugal fans, and two "cells" housing a bag array.

* Monitoring results collected in the SDADA system.

^ 80,100 scfm (estimated)

Appendix B
Equipment Spare Parts

Homer Foundry

Appendix B - Summary of Typical Sprare Parts - Comprehensive and Up-to-Date List In Maintenance Department
Baghouse System and BLDS

Brembo part number	Description	Part number	Vendor
294CHP000344	1/4" Muffler/Breather	UP1944	Allied
294CHP000345	1/4" Quick Exhaust	UP1898	Allied
294CHP000346	1/4" Muffler	UP1039	Allied
294CHP000347	2" Regulator	UP1859	Allied
286ELE000676	Stack Particulate Monitor	08510750-000B	B&W
285BEA000270	Precoat Expansion Joint 1/4 x 4" WD x 9" ID	938815	BRR
285BEA000271	Fan Expansion Joint (Inlet) 9"WD x 62-3/4"ID	938815	BRR
285BEA000272	Fan Expansion Joint (Inlet) 9"WD x 68-3/4"ID	938815	BRR
285BEA000273	Fan Expansion Joint (Inlet) 9"WD x 52-3/4"ID	938815	BRR
285BEA000287	Fan Expansion Joint (Outlet) 9" WD x 41-3/8" x 53-1/8"	938815	BRR
285BEA000289	Fan Expansion Joint (Outlet) 9" WD x 53-8/8" ID x 69 1/2" ID 3/16" Thick	938815	BRR
285BEA000294	Fan Expansion Joint (Outlet) 9" WD x 53 5/8" ID x 69 1/2"ID 3/16" Thick	938815	BRR
286ELE000655	Thermal Circuit Breaker	5SJ41xx-7HG42	C&E
286ELE000659	Programming Port	GRAC-P-R2-K3RF3	C&E
286ELE000670	Alarm Horn	450E-024	C&E
286ELE000692	Pulse Pipe - 17 Hole	NA	ETA
286ELE000859	DRIVE 6SL3224-0XE42-0UA0 POWER MOD 240 ETA SAND	6SL3224-0XE42-0UA0	SIEMENS
285BEA000269	Mold Fan Wheel	33963	IAP
285BEA000283	Finishing Fan Wheel	33816	IAP
285BEA000286	Fan Shaft	33816	IAP
285BEA000288	Sand Fan Wheels	33814 & 33815	IAP
285BEA000291	Fan Shaft	33814 & 33815	IAP
298MEC000367	Melt Fan Wheels (one CW, one CCW)	33812 & 33813	IAP
286ELE000675	Stack Flow Monitor	DPT	JMI
286ELE000693	Flow Monitor 76" Pitot Tubes	VOLUPROBE/1SS-76	JMI
286ELE000695	Stack Flow Monitor 48" Pitot Tubes	VOLUPROBE/1SS-48	JMI
286ELE000707	Flow Monitor 96" Pitot Tubes	VOLUPROBE/1SS-96	JMI
284REB000185	1" WIDE X 1/8" THICK, SPONGE RUBBER, STRIP COVER GASKET	SP100	Martin
285BEA000255	Motor Sheave	68V1400F	Martin
285BEA000256	Motor Bushing	F3 3/8	Martin
285BEA000257	Fan Sheave	68V1900J	Martin
285BEA000258	Fan Bushing	J4 7/16	Martin
285BEA000261	2 7/16" Dia. X 15 3/8" Long End Shaft, 2-Bolt Drilled And A Machined Keyway	CE5BB-W	Martin
285BEA000265	2 7/16" Ø Coupling Shaft	CC5-H	Martin
285BEA000266	1/4" THK. X 9" Mounting Plate Welded Into The Troughs With 3/8" Studs	PLATE	Martin
285BEA000278	Motor Sheave	65V1090E	Martin
285BEA000279	Motor Bushing	E3 3/8	Martin
285BEA000280	Fan Sheave	65V1320F	Martin
285BEA000281	Fan Bushing	F3 15/16	Martin
285BEA000292	Motor Sheave	88V1400J	Martin
285BEA000293	Fan Sheave	88V2000M	Martin
289BEL0000115	Mold Fan Belts 8V2240 (8 per fan)	8V2240	Martin

Homer Foundry

Appendix B - Summary of Typical Sprare Parts - Comprehensive and Up-to-Date List In Maintenance Department
Baghouse System and BLDS - Continued

Brembo part number	Description	Part number	Vendor
298MEC000363	10" X 2 7/16" X 10" PITCH X 12' 7-11/16" LG. RIGHT HAND SECTIONAL SCREW MOUNTED ON 3" SCH. 40 PIPE WITH 2-BOLT COUPLINGS. FLIGHTS TO BE MADE 3/8" THK. MILD STEEL W/ CWCS WELDING	10S524-R	Martin
298MEC000364	10" X 2 7/16" STYLE 226 HANGER ASSEMBLY WITH GREASE PIPE	10CH2265-O	Martin
299HOS000056	10" X 2 7/16" FLUSH TROUGH END	10TEDF5-BB-P	Martin
299HOS000057	10" x 14GA. X 4'-7 1/4" LG. FLANGED COVER	10TCF14	Martin
299HOS000058	10" x 14GA. X 7'-5" LG. FLANGED COVER	10TCF14	Martin
299HOS000059	10" x 14GA. X 8'-0" LG. FLANGED COVER	10TCF14	Martin
299HOS000060	10" x 14GA. X 4'-0 5/8" LG. FLANGED COVER	10TCF14	Martin
299HOS000061	10" X 4" WIDE, BUTTSTRAP	10BLF10	Martin
299HOS000062	9" OD X 10 GA. MTO INLET	INLET	Martin
299HOS000123	9" X 2 7/16" X Full (9") Pitch X 16'-5" Lg. Right Hand Sectional Screw Mounted On 3" Sch. 40 Pipe With 2-Bolt Couplings. Flights To Be 3/8" Thk. With C.W.C.S. Welding. Discharge End To Have 8 1/2" Of Bare Pipe	9S524-R	Martin
299HOS000145	9" X 3/16" THK. X 10'-0" Lg. Form Flange U-Trough	9CTF7-10	Martin
299HOS000147	9" X 3/16" THK. 4'-0" LG. FORM FLANGE U-TROUGH	9CTF7	Martin
299HOS000148	4" PIPE COUPLINGS W/ PLUGS ON SIDES OF ACCESS DOORS AT HANGERS, FITTED	4" PIPE COUPLING	Martin
299HOS000149	9" X 10 GA. THK FLUSH END DISCHARGE CHUTE W/ 3/16" THK FLANGE, DRILLED FOR A SMOOT ROTARY VALVE, FITTED	9TSDf10	Martin
299HOS000150	9" X 10 GA. THK DISCHARGE W/ BOLTED COVERS	9TSDS10	Martin
299HOS000151	9" X 2 7/16" X 1/2" THK. Trough End Fitted With Screw Conveyor Drive	9TEF5-BB-P	Martin
299HOS000153	9" X 2 7/16" X 9" PITCH X 11'-1" LG. RIGHT HAND SECTIONAL SCREW MOUNTED ON 3" SCH. 40 PIPE WITH W-BOLT COUPLINGS. FLIGHTS TO BE 3/8" THK. WITH C.W.C.S WELDING. DISCHARGE END TO HAVE 5 1/4" BARE PIPE	9S524-R	Martin
299HOS000154	9" X 2 7/16" X 6" PITCH X 11'-1" LG. RIGHT HAND SECTIONAL SCREW MOUNTED ON 3" SCH. 40 PIPE WITH W-BOLT COUPLINGS. FLIGHTS TO BE 3/8" THK. WITH C.W.C.S WELDING	9S524-R-6	Martin
299HOS000155	9" X 2 7/16" Style 226 Hanger Assembly With Grease Pipe Plumbed to Outside The Trough	9CH2265-O	Martin
299HOS000156	5/8" DIA. COUPLING BOLTS W/ LOCKNUTS	CCB5	Martin
299HOS000157	9" X 14 Ga. X 12" Lg. Flanged Cover Bolted As Per Detail With Special 1" Long Flanges.	9TCF14	Martin
299HOS000162	10" X 10 GA. THK. DISCHARGE	10TSD7	Martin
299HOS000163	10" Trough Saddle Welded To Trough	10TS	Martin
299HOS000163	10" Trough Saddle Welded To Trough	10TS	Martin
299HOS000164	10" X 2 7/16" X 1/2" THK. TROUGH END	10TEF5-BB-P	Martin
299HOS000165	10" X 2 7/16" Flush Trough End	10TEDF5-BB-P	Martin
299HOS000167	10" X 14 Ga. X 4'-7 1/4" Lg. Flanged Cover Bolted On 12" Centers	10TCF14	Martin
299HOS000170	10" X 4" Wide, Buttstrap	10BLF10	Martin
299HOS000172	10" X 3/16" THK. X 10'-0" LG. FORM FLANGE U-TROUGH	10CTF7-10	Martin
299HOS000173	10" X 3/16" THK. X 4'-0" LG. FORM FLANGE U-TROUGH	10CTF7-4	Martin
299HOS000174	10" X 10 GA THK. DISCHARGE WITH BOLTED COVER	10TSDS10	Martin
285BEA000284	Bearing, Pilot 2B 17MM FLGR FDA PTI	204-0438	Martin
286ELE000678	Pre-coat Fan	2006A3HP	NYB
298MEC000365	Slide Roller 7/8"	S00-07	
298MEC000366	Slide Blade	S10-08V1	

**Appendix C
Plan Revisions**

Pouring/Cooling Baghouse

Revision Date	Revision No.	Reviewer	Summary of Changes
Dec-18	1	J. Conard	Remove Section 1.2 as duplicate of Section 3.1. Renumber tables. Table 4: addition to PM Table 5: addition to Malfunctions / Correction Actions
Oct-20	2	J. Conard	General revisions to reflects new PTI

Appendix D
SSM Report

**Homer Foundry
Appendix D
SSM Departure Records**

Information	Description
Date	
Type of Malfunction	
Provide detailed explanation of the circumstances of event	
Provide description of corrective actions taken	
Describe the reasons the MAP was not followed.	
Describe any proposed revisions to the MAP and list revisions in table in Appendix C.	
Name	
Title	