



Mueller Brass Co.  
2709 Lapeer Avenue  
Port Huron, MI 48050  
P 800.553.0000

May 1, 2018

Dear Mr. Pinga:

As requested in the MDEQ's Violation Notice dated April 17, 2017, Mueller Brass (SRN A6262, St. Clair County) provides this response.

**Item 1**

*Alleged violation of PTI No. 180-00C FGSYSTEM B, Special Condition IV.1 Rule 336.1910 – Failure to maintain and operate Baghouse System B in a satisfactory manner:*

**Dates Violations Occurred:** Mueller has always properly operated and maintained Baghouse B. The visible emissions were first noticed on the Baghouse System B on April 2<sup>nd</sup>, during the walkthrough with MDEQ personnel. The situation was addressed as soon as was practicable, on April 4<sup>th</sup>.

**Explanation of the causes:** The 30" guillotine slide gate on Bin 5 leaked due to a combination of the gradual wearing of bearings and loosening of fasteners

**Violations ongoing:** No. The slide gate was repaired on April 4, 2018

**Summary of actions taken/proposed to be taken:**

- Three (3) refurbished slide gates installed - April 29, 2018
- Two (2) remaining slide gates will be replaced - May 28, 2018
- Two (2) slide gates in inventory at all times – May 28, 2018
- Two (2) rotary air locks replaced - April 29, 2018
- Remaining air locks will be replaced - May 28, 2018
- Two (2) rotary air locks will be maintained in inventory at all times – May 28, 2018

**Mueller Comments:** Mueller respectfully disagrees that this is a violation of either the permit or the rule. The visible emissions were first noticed during the walkthrough with MDEQ personnel, and the situation was addressed as soon as was practicable. Mueller contends that it has taken appropriate and reasonable measures to maintain and operate Baghouse System B in a satisfactory manner as evidenced by the most recent lead monitoring results.

**Item 2**

*Alleged violation of PTI No. 180-00C FGSYSTEM B, Special Condition IV.1 Rule 336.1910 – Failure to maintain and operate Baghouse System C in a satisfactory manner*

**Dates Violations Occurred:** Mueller believes that the alleged violation was the result of contractor error during the replacement of bags on April 2<sup>nd</sup>, and not the result of any failure by Mueller to maintain and operate Baghouse C in a satisfactory manner.

**Explanation of the causes:** Contractor replacing filter bags did not take adequate precautions while handling dirty bags to ensure fugitive dust control.

**Violations ongoing:** No. The bag replacement operations were completed on April 2, 2018.



**Summary of actions taken/proposed to be taken:**

- Contractors have been instructed to further amplify their efforts to control fugitive emissions during filter bag change events, as this was the source of the VE noted during the site visit.
- Mueller personnel will monitor contractors during the filter bag change out process to ensure the utmost care in controlling any fugitive emissions.

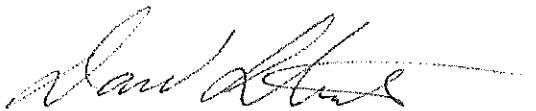
**Mueller Comments:** Mueller respectfully disagrees that this is a violation of either the permit or the rule. Mueller believes that the alleged violation was the result of contractor error, and accordingly, is in no way indicative of any failure on Mueller's part to maintain and operate Baghouse System C in a satisfactory manner. However, Mueller understands the need for improvement in dust control, and will work as noted above to address.

**Additional Measures taken:**

- A ventilation study by Schust Engineering was commissioned in November 2017, and was completed on January 19, 2018.
- As a result of the study, a recommendation for a major upgrade to the baghouse systems is being developed and will be finalized by May 7, 2018.
- An air permit modification application will be submitted to DEQ related to this project by June 15, 2018.
- Interim modifications will be made on April 28, 2019.
  - Extension of current canopy over the #3 caster holder to capture more emissions during the pouring of the melters into the holder.
  - Charge doors will be replaced with high temperature curtains, which can be closed when the melt is poured into the holder
  - The ductwork on the hoods and joints will be inspected. Short term repairs will be made during the inspection. All ductwork will be replaced as a part of the emissions upgrade project.

Mueller Brass has deep roots in Michigan and is committed to maintaining all our equipment and processes. Further, Mueller believes that the above short-term changes, in combination with the longer-term major upgrades to the emissions systems in the Port Huron facility, will allow for continued compliance now and into the future.

Sincerely,



Mr. David Struble  
EHS & Facilities Manager  
Mueller Brass Co.  
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