

Mueller Brass Co.
2199 Lapeer Avenue
Port Huron, MI 48050
P 800.550.3338

Original w/
Signature

May 24, 2018

Dear Mr. Pinga:

As requested in the Michigan Department of Environmental Quality's ("MDEQ") Violation Notice dated May 15, 2018, Mueller Brass Co. (SRN A6262, St. Clair County) presents the following responses to the alleged violations.

Alleged Violation #1

Process Description:

Casting/Rod Mill Production Processes

Alleged Rule/Permit Condition Violated:

PTI No. 180-00C, FGSYSTEMB, Special Condition IV.2; Rule 336.1910

Description of Alleged Violation:

While operating, no pressure drops for Baghouse System B were available during some days in November and December 2017. There appears to be a failure to maintain and operate Baghouse System B pressure drop indicator in a satisfactory manner and a failure to operate the air-cleaning device in a satisfactory manner. The specific days in question are 11/10/2017, 11/14/2017, and 12/4/2017;

Mueller Response to the alleged violation:

11/10/2017 - Due to operator error, "B" system pressures were not recorded on this date. The operator has been retrained on or before 15 May 2018 in the need to record all pressures.

11/14/17 - The "B" system pressures were not recorded on the day in question. However, those compartments were not utilized on that day. As the system was not operating, Mueller contends that no violation occurred.

12/4/17 - The "B" system pressures were not recorded on the day in question. However, those compartments were not utilized on that day. As the system was not operating, Mueller contends that no violation occurred.

Alleged Violation #2

Process Description:

Casting/Rod Mill Production Processes

Alleged Rule/Permit Condition Violated:

PTI No. 180-00C, FGSYSTEMC, Special Condition IV.2; Rule 336.1910

Description of Alleged Violation:

While operating, no pressure drops for Baghouse System C were available during some days in November and January 2018. There appears to be a failure to maintain and operate Baghouse System C pressure drop indicator in a satisfactory manner and a failure to operate the air-cleaning device in a satisfactory manner. The specific days in question are 11/10/2017 and 1/19/2018;



Mueller Response to the alleged violation:

11/10/2017 - Due to operator error, "C" system pressure was not recorded on this date. The operator has been retrained on the need to record all pressures. This was completed on or before 15 May 2018.

1/19/2018 – The "C" system pressure was not recorded on the day in question. The # 3 Casting furnace was not operational during the 7am – 3pm shift when the baghouse maintenance is normally performed. Therefore, the pressure was not recorded. Mueller has implemented procedures to ensure pressures are recorded if the casting units begin production on shifts other than days. These procedures were completed on or before 15 May 2018.

Alleged Violation #3

Process Description:

Casting/Rod Mill Production Processes

Alleged Rule/Permit Condition Violated:

PTI No. 180-00C, FGSYSTEMC, Special Condition IV.3; PTI No. 180-00C, PGFACILITY, Special Condition III; Rule 336.1910

Description of Alleged Violation:

Failure to maintain and operate Baghouse System C pressure drop between 4.0 and 12.0 inches W.G. across each operating compartment (or module). This practice is inconsistent with the March 2016 PM/MAP operating requirements and failure to operate the air-cleaning device in a satisfactory manner. The W.G. > 12 inches on the specific dates of 8/3/2017, 8/4/2017, 8/10/2017 and 11/12/2017 while the W.G. < 4 inches on the specific date of 8/30/2017.

Mueller Response to the alleged violation:

8/3/2017, 8/4/2017, 8/10/2017 and 11/12/2017 – The employee, who normally performs the baghouse maintenance, was on vacation on these dates. Mueller has subsequently added and trained additional employees in the PM/MAP procedures to prevent this from reoccurring. This was completed on or before 15 May 2018.

8/30/2017 – Mueller contends there were no readings below W.G. < 4 on that day and therefore no violation occurred. The original document was examined where the readings were recorded in blue ink. The readings for C11 and C12 on this date were 5.0 and 5.2 respectively.

Alleged Violation #4

Process Description:

Casting/Rod Mill Production Processes

Alleged Rule/Permit Condition Violated:

PTI No. 180-00C, FGSYSTEMC, Special Condition VIII; Rule 336.1910

Description of Alleged Violation:

Failure to discharge the exhaust gases from the Baghouse System C "unobstructed vertically upwards". Failure to operate the air-cleaning device in a satisfactory manner.

Mueller Response to the alleged violation:

Mueller is perplexed by the alleged violation. This baghouse was installed in 1970 with this same configuration and there have been no structural modifications since construction. The exhaust has never been vertically exhausted. Further, the configuration has not been noted as a violation despite numerous MDEQ inspections.

Permit No. 180-00A, which was issued in 2002, contained the following language:

“The exhaust gases from FGSYSTEMC shall be discharged to the ambient air from 16 louvered vents each with a maximum dimension of 2 feet by 2.5 feet at an exit point not less than 28 feet above the ground. There shall be two vents per module for each of the eight modules of Baghouse system C, identified as SV-BHCM1-01, SV-BHCM1-02, SV-BHCM2-01, SV-BHCM2-02, SV-BHCM3-01, SV-BHCM#-02, SV-BHCM4-01, SV-BHCM4-02, SV-BHCM5-01, SV-BHCM5-02, SV-BHCM6-01, SV-BHCM6-02, SV-BHCM7-01, SV-BHCM7-02, SV-BHCM8-01 and SV-BHCM8-02.”

It was not until the issuance of Permit No. 180-00B in 2009 that the language changed. Mueller understood that, as the structural configuration had not changed, the system was “grandfathered”. Mueller’s confidence in this interpretation was enhanced as Mueller’s PM/MAP plan reflects the louvered configuration and the plan received MDEQ approval.

Mueller also believes a typographical error exists in Special Condition VIII. In the current permit, the exhaust diameter is limited to 2.5 inches. However, in 180-00A (see above), the exhaust dimension was listed at 2.0 x 2.5 feet. Mueller requests that the MDEQ work with Mueller to correct this table. The restriction of the 2.5” diameter would prevent the baghouse from efficient operation.

Mueller contends this is not a violation of the permit.

Alleged Violation #5

Process Description:

Casting/Rod Mill Production Processes

Alleged Rule/Permit Condition Violated:

PTI No. 180-00C, FGFACILITY, Special Condition III; Rule 336.1910

Description of Alleged Violation:

Submitted records on daily baghouse check sheets (8/1/2017 – 4/2/2018) and Caster 3 & 4 furnace melts (10/1/2017 through 4/2/2018) showed inconsistent compliance with the PM/MAP

Mueller Response to the alleged violation:

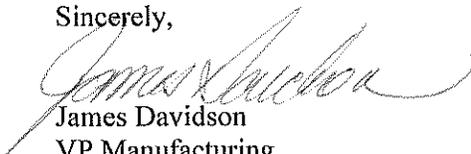
Mueller does not believe that the PM/MAP process is inadequate; however, Mueller understands the need for more effective process execution. To that end, Mueller has/is implementing several new measures including but not limited to:

- **Installation of a new PLC and cards in both “B” and “C” systems.** The PLC will allow temperature monitoring in all compartments and incoming ductwork. In addition, the system will be capable of monitoring temperatures and pressures thus providing verification that the slide gates have closed properly. In the event that a slide gate does not close properly, the PLC will send an alarm to production and/or maintenance personnel indicating that the gate must be checked. Temperature monitoring will assist in the prevention of baghouse fires and allow for a quicker response should a fire occur. The anticipated completion date is 12 June 2018.
- **Addition of baghouse operators.** There will, in the future, be baghouse operators on all 3 shifts. Historically, the PM/MAP monitoring and baghouse system maintenance was performed on 7am – 3pm shift. The additional off-shift personnel will improve the effectiveness of our PM/MAP procedure by ensuring continuous coverage. The operators began training effective on 15 May 2018 and will go to the off shifts on 29 May 2018.

The above actions and responses are in addition to those previously submitted to MDEQ on 1 May 2018.

Mueller Brass has deep roots in Michigan and is committed to maintaining all our equipment and processes. Furthermore, 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 current and continued compliance.

Sincerely,

A handwritten signature in cursive script, appearing to read "James Davidson".

4/13/18

James Davidson
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