

Metal Technologies

Three Rivers Gray Iron Plant

July 22, 2014

Mr. Rex Lane
Michigan Department of Environmental Quality
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009
269-567-3500

Re: July 8, 2014 Violation Notice Written Response

Dear Mr. Lane,

Please accept this as written response as required by the Violation Notice (VN) dated July 8, 2014. This violation has been listed in the most recent deviation report submitted July 10, 2014.

The VN is in regards to Three Rivers Gray Iron's (TRG) failure to properly document the required daily visible emissions checks. This failure was corrected June 24, 2014 following your inspection of the facility when you brought this issue to my attention. As you may remember, the failure stems from the failure to properly document the visible emission checks, i.e. the checks were conducted, although not recorded properly.

The TRG Maintenance Dept. had included the daily visible emission checks in their weekly Preventative Maintenance (PM) tasks in an effort to conserve paper. TRG will continue to handle the PM in this manner (conducted daily as part of a weekly PM), but has now included spaces to record the daily check results. Please see the attached example of the new PM #8900 sheet. You will notice that each emission location is demarked by its equipment ID # (e.g. #38900 is TRG's designation for the tool #89-00 you listed in the VN, which corresponds to the mold cooling stacks) in the left column and has each day listed in the following columns.

This violation is not ongoing. I believe that the new PM structure will keep this failure from occurring in the future.

Please feel free to contact me with any questions.

Respectfully,



Dan Plant
Corporate Environmental Manager
260-920-2137
dplant@metal-technologies.com

429 4th Street • Three Rivers, MI 49093
Phone: 269.278.1765



Daily Stack Emissions Check

Clock # 335

Date: 6/30/14 - 7/05/14

THIS IS A DAILY STACK EMISSIONS CHECK FOR ALL DUST COLLECTORS,
AND COOLING OSC. EXHAUST FANS

**Check below with (x) if visible operation was done, or (NR) if we are not running.

Completed (x) Not Running (NR)

COPY

Daily Equipment #

		JH Mon.	JH Tues.	JH Wed.	E.R Thurs.	Fri.	Sat.	Sun.
38900/	3	(✓)	(✓)	(✓)	(✓)	(NR)	(NR)	(NR)
<u>Coo. Osc.'s</u>								
38903/	3	(✓)	(✓)	(✓)	(✓)			
<u>N. Fuller</u>								
38904/	3	(✓)	(✓)	(✓)	(✓)			
<u>E. Fuller</u>								
38905/	3	(✓)	(✓)	(✓)	(✓)			
<u>W. Fuller</u>								
38906/	3	(✓)	(✓)	(✓)	(✓)			
<u>S. Fuller/Sly</u>								
38939/	3	(✓)	(✓)	(✓)	(✓)			
<u>N. Duststar</u>								
38942/	3	(✓)	(✓)	(✓)	(✓)			
<u>W. Duststar</u>								

**If any abnormal color , describe, describe corrective action, probable cause

Comments: _____

Signature: Justin Hinata
 Supervisor Signature: _____

Date: 6-30-14 / 7-5-14

RECEIVED
 JUL 28 2014
 AQD-KALAMAZOO