

May 10, 2018

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



Subject: Response to April 23, 2018 Violation Notice

Dear Mr. Lane,

Please accept this as the required response to the April 23rd Violation Notice. The VN requires a response which includes: "the dates the violations occurred; an explanation of the causes and duration of the violations; whether violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence".

- Dates:
 - 2/18/18
 - 2 broken bags found during a blacklight inspection
 - Both replaced
 - 2/27/18
 - Abnormal opacity was noticed, so the emission units associated with the North Fuller were shut down. Blacklight test was conducted and they found 4 more bad bags in the same area as the bags replaced on 2/18. They found a perforation in the blowpipe above the bad bags. This caused failure of the bags near the perforation. This was fixed with a temporary solution and a new set of blowpipes was ordered.
 - 3/3-3/4/18
 - Every blowpipe replaced and every bag replaced in the North Fuller. See attached invoice from Waltz-Holst.
- Causes and Duration:
 - We believe that the bag penetrations were the result of a perforation in a blowpipe in the North Fuller. See attached photo. This perforation was likely due to normal wear-and-tear.
 - It is not possible to know the exact duration of any events caused by the broken bags because they were fixed as soon as they were discovered.
 - All dust collectors at TRG are blacklight tested at least monthly to ensure proper operation and bag integrity.
- The violation is not believed to be ongoing as we have fixed the blowpipe and have not noted additional visible emission abnormalities.
 - Please see the attached blacklight test reports from 3/31 and 4/22.

Three Rivers Gray Iron

- Summary of actions taken and/or to be taken and associated dates:
 - The blowpipe was repaired with a temporary patch (see attached photo) on 2/27/18 and subsequently replaced with a new pipe on 3/4/18. In addition to replacing the defective pipe, TRG replaced all of the pipes at this time.
- Steps being taken to prevent a reoccurrence:
 - Continue to conduct daily visible emission readings
 - Continue to monitor and record differential pressure of the baghouse
 - Installation of a bag leak detection system on the stack associated with the North Fuller baghouse (see attached sales order from Auburn Systems). The system is installed and we expect to have the communications completed and the system fully operational by mid-May.
 - TRG has taken the additional step of reviewing other processes that could impact fugitive emissions in order to further reduce the chances to impact the surrounding area.

Additionally, due primarily to this incident, Metal Technologies has made the decision at the corporate level to install bag leak detection systems on all stacks at TRG by the end of 2019. It is an unfortunate fact that bags can fail in even the best-maintained baghouses. We believe that the installation of the new bag leak detection systems will provide an additional layer of defense in preventing any negative impacts to our neighbors due to these unfortunate events.

Respectfully,



Dan Plant
Corporate Environmental Manager
Metal Technologies of Indiana, LLC