

Project: EGLE Violation Notice Remediation Plan
 Notice #: SRN: N1022, Wayne County
 Inspection Date: August 28, 2023
 Notice Date: September 29, 2023
 Target Completion Date: November 15, 2023
 EGLE Representatives: Eric Grinstern, Jill Zimmerman

**Metaltec Steel Abrasive Company
 Violation Remediation Action Plan**



GOAL: Respond to and address each of the 5 items outlined in the EGLE Violation Notice letter by October 20, 2023 and complete them by November 15, 2023

Violation Process Rule Violate	Remediation Plan Description	Actions Taken to Date	Target Date / Actual Comp Date
<p>Failure to maintain the fabric collector with an alarm that sounds when the pressure drop exceeds 5 inches of water.</p> <p>EUGRITPROCESS PTi No. 258-07, EUGRITPROCESS, Special Condition 1.3</p>	<p>Replace existing alarm on Grit Plant; East Baghouse with working alarm that sounds when pressure drop exceeds 5" W.P.</p>	<p>On 09/08/2023 new Dwyer A-285 remote alarm annunciators were purchased for the North, West and East baghouses. Shipping date is stated by the manufacturer to be approximately 11/01/2023.</p>	<p>11-03-2023 /</p>
<p>Visible emission readings conducted via Method 9 during the inspection exceeded a six-minute average of 5 percent opacity. A six-minute average of 35 percent was documented.</p> <p>FGFOUNDRYNORTH PTi No. 258-07, FGFOUNDRYNORTH, Special Condition 2.2</p>	<p>Investigate reason(s) for visible emission readings exceeding 5% opacity (35%) during the inspection</p>	<p>Without the north baghouse running and the south furnace pouring, a lot of smoke was generated that had nowhere to go other than out the openings of the building.</p> <p>To prevent this from occurring even when all conditions are normal, ductwork is being examined for buildup, and scrap bay doors will be lowered to mitigate excessive visible emissions from doors and openings, should the occur</p>	<p>09-05-2023 /</p>

Project: EGLE Violation Notice Remediation Plan
 Notice #: SRN: N1022, Wayne County
 Inspection Date: August 28, 2023
 Notice Date: September 29, 2023
 Target Completion Date: November 15, 2023
 EGLE Representatives: Eric Grinstern, Jill Zimmerman

Metaltec Steel Abrasive Company
Violation Remediation Action Plan



GOAL: Respond to and address each of the 5 items outlined in the EGLE Violation Notice letter by October 20, 2023 and complete them by November 15, 2023			
Violation Process Rule Violate	Remediation Plan Description	Actions Taken to Date	Target Date / Actual Comp Date
<p>Failure to maintain the fabric collector with an alarm that sounds when the pressure drop exceeds 5 inches of water. The furnace was operating while the baghouse was not operational.</p> <p>FGFOUNDRYNORTH PTI No. 258-07, FGFOUNDRYNORTH, Special Condition 2.3</p>	<p>Replace existing alarm on North Foundry; North Baghouse with working alarm that sound when pressure drop exceeds 5" W.P.</p>	<p>On 09/08/2023 new Dwyer A-285 remote alarm annunciators were purchased for the North, West and East baghouses. Shipping date is stated by the manufacturer to be approximately 11/01/2023.</p>	<p>11-03-2023 /</p>
<p>Failure to maintain the fabric collector with an alarm that sounds when the pressure drop exceeds 5 inches of water. The furnace was operating without capture to the baghouse.</p> <p>FGFOUNDRYSOUTH PTI No. 258-07, FGFOUNDRYSOUTH, Special Condition 3.3</p>	<p>Replace existing alarm on South Foundry; West Baghouse with working alarm that sound when pressure drop exceeds 5" W.P.</p>	<p>On 09/08/2023 new Dwyer A-285 remote alarm annunciators were purchased for the North, West and East baghouses. Shipping date is stated by the manufacturer to be approximately 11/01/2023.</p>	<p>11-03-2023 /</p>

Project: EGLE Violation Notice Remediation Plan
 Notice #: SRN: N1022, Wayne County
 Inspection Date: August 28, 2023
 Notice Date: September 29, 2023
 Target Completion Date: November 15, 2023
 EGLE Representatives: Eric Grinstern, Jill Zimmerman

Metaltec Steel Abrasive Company
Violation Remediation Action Plan



GOAL: Respond to and address each of the 5 items outlined in the EGLE Violation Notice letter by October 20, 2023 and complete them by November 15, 2023

Violation Process Rule Violate	Remediation Plan Description	Actions Taken to Date	Target Date / Actual Comp Date
<p>Failure to take appropriate action procedures in accordance with the facility Malfunction Abatement Plan when the baghouse associated with FGFURNACENORTH malfunctioned.</p> <p>FGFACILITY PTI No. 258-07, FGFACILITY, Special Condition 4.4</p>	<p>On the morning of the inspection, the v-belts for the North baghouse burned off and the unit stopped operating (no dust / smoke collection). As soon as the malfunction was discovered, the direct-fire shot dryer (next process downstream from the melt furnaces) was shut down as is mandatory for safety reasons. At the same time, the south furnace in the north foundry was finishing melt out which is the stage prior to pouring the molten steel. Once the furnace is at that stage in the production process, the molten steel is at 3100 degrees F and the pouring process cannot be halted without significant damage to the furnace. The furnace began and finished pouring during the inspection, but no product was processed any further (the shot dryer was not running). Following the pour, both the north furnace and south furnace in the north foundry were shutdown until repairs to the north baghouse were completed.</p>	<p>Although the atomization process was not shut down as explained, overall production <i>was</i> shut down vis-a-vie the shot dryer not in operation and is an integral part of the steel shot production process.</p> <p>To prevent this occurrence in future, the P.M. program for the baghouses is being reviewed and "v-belt replacement" will be analyzed and adjusted to decrease time between replacement</p>	<p>10-30-2023 /</p>