



June 28, 2016

Mr. Tyler Salamasick
Environmental Quality Analyst
Department of Environmental Quality
Air Quality Division
27700 Donald Court
Warren, Michigan 48092-2793



Re: FormTech Industries LLC Violation Notice

Dear Mr. Salamasick:

We received your follow-up letter dated June 15, 2016 to our response regarding the original DEQ violation notice from May 5, 2016. While we firmly stand behind our response that the operation of the baghouse was not in violation, nor was particulate material leaving the property, we have attached the following information, as requested:

- Information demonstrating the baghouse and Coining Cell Line are exempt from an air permit to install – We do consider the baghouse to be exempt from an air permit to install based upon the fact that the baghouse collects dust coming from the Wheelabrator (shot blast) only. Steel parts come from heat treat into the Wheelabrator and then into the Coining Cell.
- Corrective actions that have taken place regarding operation of the Coining Cell baghouse.
- Records demonstrating proper operation and maintenance of the baghouse.

The unit in question is a Wheelabrator shot blasting unit that provides dry abrasive low carbon cast steel shot blasting on small metal parts that was installed in June 2013. The unit is equipped with a screw conveyor reclamation system to clean and recycle media back into the system while acting as a mechanical precleaner directing any fines, sand and scale to the waste collection drum at the bottom of the unit before being vented/ exhausted to the outside through a dust collector. The dust collector unit, which is located outside of the building, is a Wheelabrator slide-in Cartridge Dust Collector that was part of the initial installation of the Shot Blast unit. The Cartridge Dust Collector is a continuous, automatic, pulse-type unit where the dust particles are effectively captured on the outer surfaces of the cartridge filters. Cleaning of filter media is performed by various venturi systems using periodic metered pulses of high pressure air into the center of the cartridge filters. The reverse air pulse releases the collected dust from the outer surface of the filters into the waste dust collection drum at the bottom of the unit. Please refer to the attached blueprint of the dust collector and relevant pages from Wheelabrator Operation & Maintenance Manual for more information on the design, and operation on the shot blasting Wheelabrator and the Dust collector. Also, please find enclosed



the following records demonstrating proper operation and maintenance of the Wheelabrator shot blasting unit and associated equipment including dust collector:

- Weekly and monthly maintenance work requests conducted by FormTech's Maintenance Department on the Wheelabrator equipment since the beginning of 2016.
- Approved requisitions of recent dust collector maintenance performed by Ingersoll Mechanical, including filters change
- Approved requisition with Ingersoll Mechanical to conduct quarterly maintenance on the dust collector.
- A letter from Ingersoll Mechanical verifying the installation of a photohelic differential pressure gauge to monitor Post Filtration downstream of the main cartridge filters filtration with an alarm system. Included in the letter are the operating parameters for the pressure drop.

In addition, on April 20, 2016, HHI FormTech started conducting daily and weekly preventive maintenance inspections specifically targeted to the dust collector that were developed in consultation with Ingersoll Mechanical. Enclosed with this report is a summary of all the completed work requests since we started this activity and sample completed work requests.

In regard to the piles of the metallic particles and dust on-site per your observation during your inspection, HHI FormTech conducted a major cleanup of the exterior of the facility including the dust collector area. Please find enclosed with this response current photos of the area after cleaning. We are evaluating if any further cleanup to remove any contaminated dirt or traces of contaminations is needed. The recently instated daily and weekly dust collectors PMs do address adequate housekeeping. Moreover, HHI FormTech has installed an enclosure around the collection drum to eliminate any outdoor spillage of dust during change and handling. The drum is enclosed by three steel walls and one door.

After receipt of this information, we formally request a meeting with you to discuss these alleged violations and the operation of the baghouse. Please let us know your availability.

Thank you for your time with this matter

Sincerely,

A handwritten signature in cursive script that reads "Linda Jarbo".

Linda Jarbo,
Director of Human Resources

Cc: Jennifer Dudley – Corporate Counsel
Dean Teeple – Vice President EHS
Brian Cicilian – Plant Manager FormTech Fraser
Ron Parrish – Operations Manager FormTech Fraser