

RECEIVED
AQD

APR 02 2020

MACES _____ MAERS _____
FILE _____

GREAT LAKES CASTINGS LLC

800 N. Washington
Ludington, MI 49431

AAF WET DUST COLLECTOR

EUDISAWETDC
GLC # 14100

MALFUNCTION ABATEMENT PLAN

JULY 2010

Last Update 2020

TABLE OF CONTENTS

Section	Description	Page
1	Introduction	3
2	Responsible Supervisory Personnel	4
3	Preventive Maintenance Program	4
	3.1 Inspection Activities	4
	3.2 Major Replacement Parts	5
4	Malfunction Detection	5
5	Corrective Action Procedure	6

Attachments

Attachment A	List of Responsible Supervisory Personnel	7
---------------------	--	----------

Section 1 Introduction

The purpose of this plan is to prevent, detect, and correct malfunctions or equipment failures resulting in emissions exceeding permitted emission limitations applicable to operation of wet dust collector air pollution control equipment for the Disamatic Line.

This MAP, has been prepared to comply with the requirements of MI-ROP-A3934-2015, as well as Michigan Air Pollution Control Rules 910 and 911. Michigan Rule 910 requires the proper installation, maintenance, and operation of air pollution control systems. The Rule reads: An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law. Michigan Rule 911 specifies that, upon request of the MDEQ, a facility must prepare a MAP to prevent, detect, and correct malfunctions or equipment failures resulting in emissions exceeding any applicable emission limitation.

Rule 113(a) defines a malfunction as: Malfunction means any sudden, infrequent and not reasonably preventable failure of a source, process, process equipment, or air pollution control equipment to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. A true malfunction must have a reasonable potential to cause:

- An operating parameter to stray from an acceptable range or value that has been established to indicate compliance with an emission limit or
- An exceedance in emissions or operating parameter

Most malfunctions of the control equipment will not result in emissions exceedances.

However, the systems must be returned to service as soon as possible to maintain maximum emission control. If a malfunction or failure occurs that cannot be corrected by an operator, then a Work Order will be issued to repair the system.

Following is a list of malfunction events covered by this Plan.

- Failure of emission control system components.
- Failure of Waste Water Treatment system components.
- Power failure
- Sudden and unavoidable failure of control or process equipment, not due to poor operation or maintenance procedures

Section 2 Responsible Supervisory Personnel

Great Lakes Castings LLC (GLC) will maintain a current list of responsible supervisory personnel. This list will include individuals responsible for overseeing the inspection, maintenance and repair of wet dust collector air pollution control equipment. The current list of responsible supervisory personnel appears as Attachment A.

Section 3 Preventive Maintenance Program

This preventive maintenance program includes a description of the air pollution control equipment that will be inspected, the frequency of inspections, and an identification of the major replacement parts that are maintained in inventory for replacement.

Section 3.1 Inspection Activities

GLC will complete the following inspection or repair activities.

Daily Activity (This activity applies only to days on which the device is operated.)

1. Observe emissions from the wet dust collector exhaust stack.
2. Observe whether the monitoring equipment is functioning properly.
3. Observe and record the water flow rate at the collector.
4. Inspect clean air plenum, drain and drain sump.

Weekly Activity**

1. Inspect the tees, nozzles, cones and barrels for alignment and cleanliness.
2. Inspect drains and vents.
3. Inspect the collection section, water eliminator section and the clean air plenum.
4. Check housing for holes and leaks.
5. Check door seals for leaks.
6. Check fan impeller for buildup.

* - This activity applies only to weeks during which the device is operated for at least 4 days. During slow work periods (less than 4 days per week)

this activity will be completed every other week or once per month if less than 10 days are worked per month.

Semi-Annual Activity

- 1. Inspection of blower, motor and recirculating pump.**

Section 3.2 Major Replacement Parts

GLC will take reasonable steps to maintain an inventory of major replacement parts on site. This inventory may include blower motor, blower drive belts, tees and cones. In some instances, only one replacement part may be in inventory for a particular item. Once this single item is removed from inventory, it will be replaced as soon as practical.

Section 4 Malfunction Detection

GLC will monitor air-cleaning device operating variables to detect a malfunction by identifying the normal operating range of these variables, and monitoring deviation from the normal operating range. The plan will include a description of the method of monitoring or surveillance procedures.

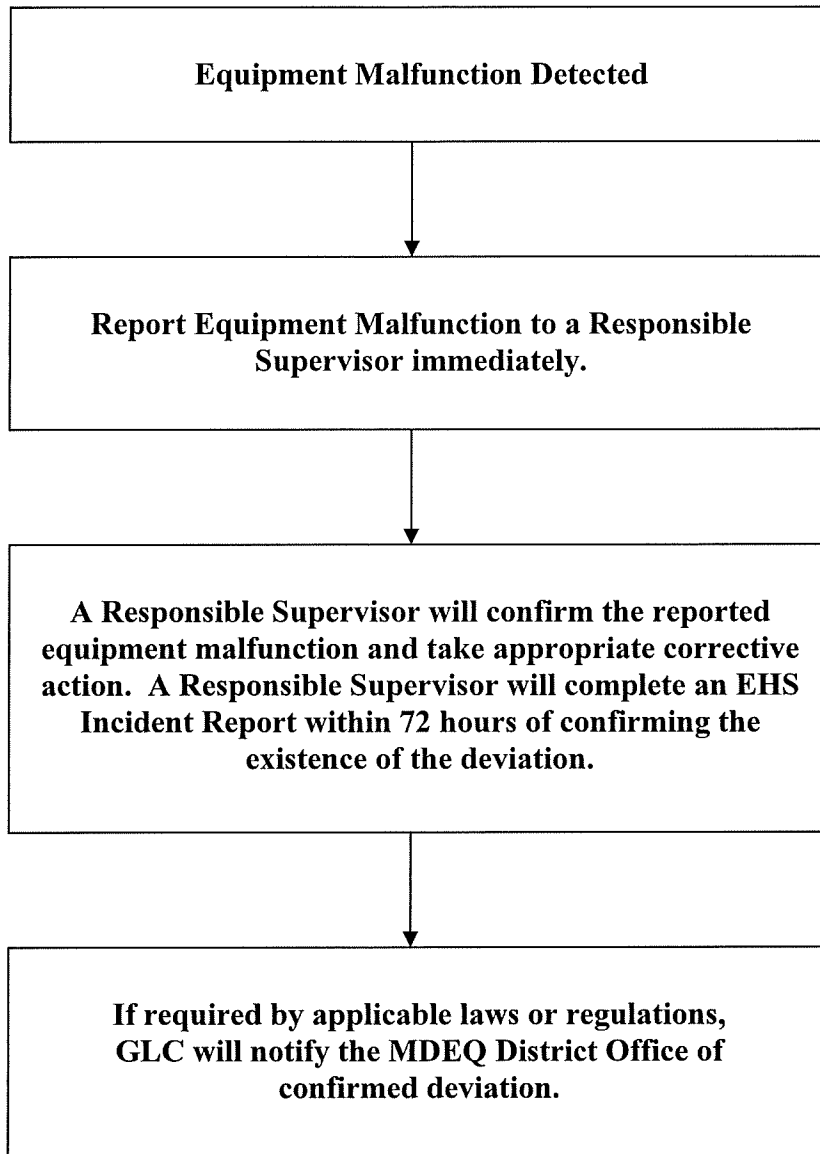
Section 4 Malfunction Detection (cont.)

The following air-cleaning device operating variable(s) have been identified:

- The wet dust collector exhaust stack will be observed daily, as described in Section 3, to determine whether visible emissions exceed normal levels.**
- The wet dust collector will be equipped with a water flowmeter. The water flow rate at the collector will be monitored daily, as described in Section 3, to determine whether it is within its normal operating range. The Air Quality Permit (ROP) operating range for this scrubber is 100 to 300 gallons per minute of water. The Compliance Assurance Plan (CAM) operating range is 150 to 275 gallons per minute of water.**

Section 5 Corrective Action Procedure

This section describes the corrective action activities that GLC will complete in response to an equipment malfunction.



Attachments

Attachment A - List of Responsible Supervisory Positions*

Department Supervisor 1 st Shift – Dave Beadle	Ext 291
Department Supervisor 2nd Shift – Scott Hodges	Ext 279
Department Supervisor 3rd Shift – Charlie Anible	Ext 522
EHS Supervisor – Gordon Anderson	Ext 205
Maintenance Supervisor 1 st Shift – Mike Holmes	Ext 256
Maintenance Supervisor 2nd Shift – Dave Scott	Ext 270
Environmental Manager –Bob Ellis	Ext 238
Engineering Manager – Mike Cicholski	Ext 209
Plant Superintendent – Dave Beadle	Ext 291

* - GLC may assign supervisory responsibilities to
other positions as necessary to meet plan requirements.