



AmeriTi Manufacturing Company
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President

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This letter is the response to the Notice of Violation issued to AmeriTi Manufacturing Company on September 25, 2020. The NOV outlines problems identified during the visit by EGLE to the AmeriTi facility on December 4, 2019. The answers and corrective actions to the violations are addressed in the next paragraphs.

The Melt Shop Department reported a low pressure drop reading on December 10, 2019. The reading was 1" which is below the acceptable range of 2" to 6". Reactive Maintenance should have been initiated and there were not any records of the maintenance response.

On December 10, 2019 when this reading was taken was taken in the Melt Shop, and the PD was recorded as 1", the procedures were not clear for the supervisor and the training was not sufficient. A low reading indicates the baghouse is drawing very well, and the pressure drop will increase as the bags get coated. The 2" to 6" range is the normal operating range. At the beginning of a shift, it is possible the bags have been pulsed and shaken down, but not re-coated. After a short period of time (normally less than 30 minutes) the bags have been coated and the pressure drop will be in the normal range. The supervisor recorded the pressure drop as the initial reading, before the unit had achieved steady state.

It is common for certain emission units to start up with readings outside of the range, and soon gets within the range. This is common with the melt shop baghouse, as it often takes some time for the bags to get coated and the pressure drop to increase. Another example is adding water or removing water in a scrubber, if the pressure drop is low or high.

The startup and reporting process have been established as follows. At the beginning of every shift the operator MUST complete the process STARTUP CHECKLIST. The operator goes through the startup procedure and the emission unit must achieve steady state operation, and then the operator records the reading on the checklist (such as pressure drop, flow rate, temperature, etc.). If there are any problems the operator immediately contacts the supervisor. The supervisor and the operator first work together to address the problem.



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Following the completion of the STARTUP CHECKLIST and steady state operation of the equipment, the checklist gets turned in to the supervisor.

If within-range, the supervisor will record the reading into the GPS plant-wide computer system. This should be done soon after the reading has been taken (at the beginning of each shift).

If the unit cannot be brought within-range, then the actual value is recorded (out-of-range) into the GPS system, and then a work order will be automatically generated for reactive maintenance. The supervisor must also call the maintenance supervisor or maintenance shift leader. The work order must be addressed by maintenance within one hour.

During the time when there is an out-of-range reading, the supervisor and the operator must check the emission unit exhaust. If there is a particulate emission, that is not getting corrected, the unit must be shut down. Safe shutdown procedures must be followed.

For the melt shop specifically, the new procedure requires the operator to check the PD again in 30 minutes which is enough time for the coating of the bags, and then make sure the PD has increased within the normal range. This is a normal startup condition, and the pressure drop reading should not be recorded until reaching steady state.

The GPS maintenance module automatically issues a work order for reactive maintenance. The operating department supervisor also calls the Maintenance Manager or the Maintenance Shift Leader. The reactive maintenance must be addressed within one hour.

The supervisor also monitors the readings throughout the shift. If there is a finding of an out-of-range reading, the same procedure is followed. First try to correct the situation, then record the out-of-range reading, and initiate the work order process for reactive maintenance.

The root cause of the problem was lack of thorough training for the department supervisors and maintenance supervisors. They were not fully aware of their responsibilities in the many different situations that can occur. As of December 10, 2019, the training was not adequate.

AmeriTi has taken the following corrective actions. AmeriTi has developed a custom-programmed computer system referred to as GPS. There is a module for the recording of the EU monitoring data and there is a maintenance module for work orders and recording of work performed. The GPS emission unit module requires each department supervisor to enter the monitoring data recorded from the beginning of every shift. It will alert supervisors (and their managers) of missing data, so it can be completed. When a low or high reading (out-of-range) is recorded, the maintenance module will automatically issue a work order for reactive maintenance, and the supervisor should also call maintenance.



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Throughout the last ten months, AmeriTi has been working on the PMP/MAP, startup and operating procedures, programming of the GPS system, and the training of its employees. The Reactive Maintenance and Preventative Maintenance sections for all emission units have been reviewed and corrected.

AmeriTi received a new permit 549-97B (issued on September 18, 2020). AmeriTi will be issuing a new revision of the PMP/MAP within the 90-day requirement (hopefully within the next 14 days).

Please contact me with any further questions or comments.

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