



Mueller Brass Co
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June 25, 2019

EGLE
AQD - Grand Rapids District
350 Ottawa Avenue NW, Unit 10,
Grand Rapids, Michigan 49503
Attn.: Mr. Eric Grinstern

Dear Mr. Grinstern:

As requested in the Michigan Department of Environmental Quality's ("MDEQ") Violation Notice dated June 5, 2019, Mueller Brass Company (SRN B1650, Ionia County) presents the following responses to the alleged violations:

Alleged Violation #1

Process Description:

Induction Melting Furnaces No. 7 and No. 8

Alleged Rule/Permit Condition Violated:

PTI No. 16-11, FGMELTFURN, Special Condition IV.1; Rule 910

Description of Alleged Violation:

On April 26, 2019, the AQD staff observed operation of the No. 7 Furnace while the west chamber of the East Baghouse was inoperable. It was determined that the No. 7 Furnace was operated with only one of the two chambers of the East Baghouse operational from March 22, 2019 until May 1, 2019, following a fire on March 16, 2019 that rendered the west chamber of the East Baghouse inoperable. Additionally, review of the East Baghouse pressure drop records showed that the No. 7 Furnace operated on 10 days, when one or both of the chambers of the baghouse had pressure drop readings outside of the established range for proper operation.

Mueller Response to the alleged violation:

January 31, 2019 – February 1, 2019 – Pressure drop readings > 8.0" on the West Chamber. On January 31, 2019, the pressure drop reading on the West Compartment magnehelic gauge was 5.5". The magnehelic gauge reading on February 1, 2019 was 9.0". Casting operations were halted. It was determined the West Chamber lip seal had failed, and accordingly, the seal was replaced. Analysis of the continuous monitoring data indicated that the pressure exceeded 8" beginning at 2:40 pm on January 31, 2019 and ending at 2:45 pm on February 1, 2019, for a total period of 24 hours.

February 2, 2019 – Pressure drop readings of 0.0" for both the East and West Chambers. The West Chamber was still under repair, and the casting operation was idle. Thus, Mueller disputes that there was any violation.

February 6, 2019 – February 8, 2019 – Pressure drop readings of 0.0" for the West Chamber. The reverse air plenum had de-railed in the West chamber. The chamber was isolated and the plenum, track and rails were replaced. Analysis of the continuous monitoring data indicated the pressure drop of 0" beginning at 8:25 am on February 6, 2019 and ending at 2:10 pm on February 8, 2019, for a total duration of ~ 54 hours.

February 20, 2019 – Pressure drop readings of 0” for the West Chamber. The guide rail failed in the West Chamber and accordingly, was repaired. Analysis of the continuous monitoring data indicates the pressure drop 0” in the West baghouse beginning at 8:55 am on February 20, 2019 and ending at 12:40 pm on February 20, 2019, for a total period of 3 hours and 45 minutes.

February 21, 2019 – Pressure drop readings over 8” on the East Chamber and readings of 0” on the West Chamber. Analysis of the continuous monitoring indicated the pressure drop readings of 0” on the West baghouse and over 8” on the East Chamber beginning at 10:55 am on February 21, 2019 and ending at 11:15 am on February 21, 2019, for a total duration of 20 minutes. The root cause of this 20 minute variance is currently undetermined.

March 16, 2019 – Pressure drop readings of over 8” in the West Chamber. The cable tray failed on the carriage. Repairs were made, but the West Chamber subsequently caught fire. Analysis of the continuous monitoring data indicated a pressure drop of over 8” beginning at 8:40 am on March 16, 2019 and ending at 11:15 am on March 16, 2019, for a total period of 3 hours and 35 minutes.

March 23, 2019 – April 30, 2019 – Casting one (1) 12-hour shift per day (with occasional overtime) with only East chamber of baghouse operational. Dates March 22, 2019 – May 1, 2019. On March 16, 2019, the West Chamber of the baghouse was destroyed in a fire and was sent out for repair. As of May 1, 2019, all casting operations were suspended.

As indicated, casting operations have ceased. There are currently no plans to restart such operations, as all brass is cast at the Port Huron facility. However, the West Chamber refurbishment continues and is anticipated to be complete no later than July 15, 2019. This will allow the baghouse to be reinstalled and restored to full service in the event that circumstances require casting to restart.

Mueller Brass appreciate the opportunity to respond to these alleged violations. If there are questions or further information is needed, please advise. Thank you for your time and consideration.

Best regards,



Chuck Blanton
Environmental, Health & Safety Director
901-753-3224

cc: Ms. Jenine Camilleri, EGLE