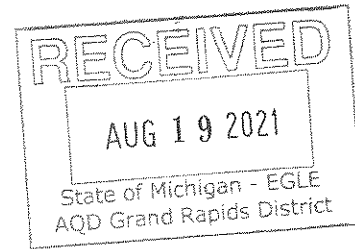




1413 Callaghan Street
Greenville, Michigan 48838

Phone: (616) 754-1100
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August 13, 2021



Mr. Eric Grinstern
EGLE, AQD
Grand Rapids District
350 Ottawa Avenue, NW
Grand Rapids, MI 49503-2341

Re: July 29, 2021 Violation Notice – Kent Foundry Company (SRN B1737)

Dear Mr. Grinstern:

The following is a review of the violations noted in your July 29, 2021 Violation Notice to Kent Foundry Company (SRN B1737). Facility maintenance personnel have reviewed the bag leak detection system for the fabric filter collectors on Baghouses 1, 2 & 3 to ensure they are maintained and operated in a satisfactory manner in accordance with the requirements noted in PTI 704-91C.

The following dust collector violations were listed on your July 29, 2021 Violation Notice:

EUPROCESSA PTI No. 704-91C, EUPROCESSA, Special Condition IV.2- Failure to maintain and operate a broken bag detection system.

IV. 2 The permittee shall not operate the EUPROCESSA unless the bag leak detection system for the fabric filter collector (Baghouse No. 1) is installed, maintained, and operated in a satisfactory manner (R 336.1331, 40 CFR 52.21 (c) * (d)).

EUPROCESSB PTI No. 704-91C, EUPROCESSB, Special Condition IV.2- Failure to maintain and operate a broken bag detection system.

IV. 2 The permittee shall not operate the EUPROCESSB unless the bag leak detection system for the fabric filter collector (Baghouse No. 2) is installed, maintained, and operated in a satisfactory manner (R 336.1331, 40 CFR 52.21 (c) * (d)).

EUPROCESSC PTI No. 704-91C, EUPROCESSC, Special Condition IV.2- Failure to maintain and operate a broken bag detection system.

IV. 2 The permittee shall not operate the EUPROCESSC unless the bag leak detection system for the fabric filter collector (Baghouse No. 3) is installed, maintained, and operated in a satisfactory manner (R 336.1331, 40 CFR 52.21 (c) * (d)).

Explanation of violation causes:

The broken bag leak detection system for the fabric filters on dust collectors 1,2 and 3 were inspected by facility maintenance personnel to determine the exact nature of the violation. The warning indicator light was not functioning, and the warning horn for the baghouse electrical switchboxes located behind the shot blast inside the facility was disconnected.

Dates the violation occurred:

The violation was noted during the July 29, 2021 EGLE inspection; however, it was difficult to determine when the warning indicator light and the warning horn were damaged.

Duration of violation:

It is indeterminate how long the warning indicator light and warning horn were not functioning.

Violations ongoing:

The warning indicator light and warning horn will be corrected within timeframe below.

Dates by which the actions will take place:

The warning indicator light will be replaced and a new warning horn has been ordered. Both will be installed no later than November 1, 2021.

Steps to be taken to prevent the reoccurrence of violations:

To ensure the violations will not occur in the future, warning indicator light and warning horn weekly function checks will be added to the facility preventative maintenance system and in effect no later than November 1, 2021.

EUPROCESSD PTI No. 704-91C, EUPROCESSD, Special Condition III.1 – Failure to maintain a minimum temperature of 1240 degrees F, for the exhaust gases from the Thermfire System.

The permittee shall not operate EUPROCESSD unless a minimum temperature of 1240 degrees F is maintained for the exhaust gases from the hood of the Thermfire system. (R 336.1205, R 336.1225, R 336.1702, R 336.1901, R 336.1910).

Dates the violation occurred:

From January 1, 2021 through June 30, 2021 approximately (444) 5-minute time periods were noted on the Thermfire temperature printouts below the 1240F degrees allowable exhaust temperature minimum.

Explanation of violation causes:

Facility maintenance personnel have inspected the Thermfire system to determine what is causing the exhaust gas readings to be below the minimum allowable exhaust temperature of 1240F degrees. The

Mr. Eric Grinstern
August 13, 2021
Page 3

instances of temperatures that are below the threshold appear to have increased from January 2021 through June 2021. Due to the random nature of the low temperatures, maintenance personnel suspect defective temperature probes that were originally installed in the system.

Duration of violation:

According to the THERMFIRE temperature printouts, from January 1, 2021 through June 30, 2021 there were approximately (444) 5-minute time periods where the exhaust temperature was less than the 1240F degrees allowable minimum temperature.

Violations ongoing:

If the problem is associated with defective temperature probes, it is assumed the temperature printouts will continue to indicate exhaust temperatures below the 1240 degrees F. minimum exhaust temperature until the defective probes are replaced.

Summary of actions taken or proposed to be taken:

Facility maintenance personnel have ordered new temperature probes and plan to install the new probes upon receipt. Additionally, we may increase the lower setpoint of the upper bed with PLC changes by the OEM. We expect to make these changes and verify efficacy by December 1, 2021.

Steps to be taken to prevent the reoccurrence of violations:

Temperature logs will be retrieved monthly to monitor temperature threshold compliance. In addition, spare temperature probes will be maintained onsite to allow maintenance personnel to expedite replacement of defective probes when they malfunction.

If you have any additional questions or concern, please contact Mr. Wendell Kauffman, Kent Foundry Company at (616) 754-1100 x305.

Sincerely,



Wendell Kauffman
President

CC: William H. Hilton, RCSI

CC: Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
P.O. Box 30260
Lansing, Michigan 48909-7760

