

November 2, 2022

Michigan Department of Environment, Great Lakes & Energy
Grand Rapids District Office
Attn: Eric Grinstern and District Supervisor
State Office Building, 5th Floor
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2341



**RE: Aludyne Machine – Montague (B1925), Permit To Install No. 41-00F
Written Response to EGLE September 30, 2022 Violation Notice**

Dear Mr. Grinstern:

Aludyne Montague, LLC (Aludyne Montague) submits this letter in response to the Michigan Department of Environment, Great Lakes and Energy's (EGLE's) September 22, 2022 Violation Notice. The EGLE Violation Notice required that Aludyne Montague provide a written response to cited violations by October 21, 2016 (within 21 calendar days of the June 15, 2016 letter). Upon request by Aludyne Montague on October 18, 2022, EGLE granted an extension until November 7, 2022. The following violations were cited by EGLE:

- PTI No. 41-00C EU_Dryer (Aluminum Chip Dryer) Special Condition VI.3: Failure to maintain records of the afterburner temperature for each operating cycle of time period used in the performance test.
- PTI No. 41-00F, FG_Furn1,2, Special Condition VI.2: Failure to conduct visible emission observations for the vents and openings in the upper part of the building containing FG_Furn1,2.

Aludyne Montague's responses to the cited violations are provided in the following paragraphs and referenced attachments.

Failure to Maintain Records of the Chip Dryer (EU_Dryer) Afterburner Temperature for Each Operating Cycle

Duration/Dates the Violation Occurred:

- While Aludyne Montague's automated chip dryer afterburner temperature monitoring and recording system was and continues to be operational,

records were not being downloaded and reports produced from the dedicated memory drive on the plant floor to a backed-up Aludyne Montague network drive from the time period starting in October 2021 through October 20, 2022.

Explanation of the Causes of the Violation:

- Records and reports produced were not backed up by Aludyne Montague's previous EHS representative on Aludyne Montague's secured network drive, and the computer hard drive utilized by the representative to temporarily store chip dryer afterburner temperature records and reports crashed after their departure.
- Aludyne Montague did not have an effective system of checks and balances in place to ensure that temperature records for chip dryer afterburner and associated reports would be downloaded, reviewed and stored on Aludyne Montague's backed-up network drive in the event of the responsible person's absence or a change in responsibilities. Therefore, in the absence of the prior EHS representative, Aludyne Montague did not have other persons knowledgeable of how to download the records and produce the reports during or shortly after EGLE's inspection.

Whether the Violation is Ongoing:

- No; temperature records and reports for the chip dryer afterburner for 2021 and 2022 Quarters 1-3 were downloaded from the dedicated memory drive on the plant floor on October 20, 2022, and have been stored on the backed up Aludyne Montague network drive.

Summary of Corrective Actions Taken:

- Aludyne Montague hired a replacement EHS Manager on August 15, 2022 who will be primarily responsible for downloading and producing the chip dryer afterburner temperature records and reports, and saving documentation on Aludyne Montague's backed-up network drive.
- Aludyne Montague retained a firm with representatives familiar with the monitoring and reporting software to assist and train Aludyne Montague representatives in downloading and producing the reports. As indicated above, temperature records and reports for the chip dryer afterburner for 2021 and 2022 Quarters 1-3 were downloaded from the dedicated memory

drive on the plant floor on October 20, 2022, and have been stored on a backed up Aludyne Montague network drive.

- Records not previously made available to EGLE for the time period from October 2021 through September 30, 2022 have been included in this response. Attachments 1-3 contain monthly, daily and 3-Hour chip dryer afterburner temperature reports, while Attachment 4 includes a description of reported deviations on those reports.

Summary of Preventative Actions Taken:

- Aludyne Montague initiated establishment of a monthly assignment in its automated preventative maintenance (PM) system on October 31, 2022 which triggers printing, issuing, and tracking a monthly PM through completion of the chip dryer afterburner temperature report downloading, reviewing and filing on Aludyne Montague's backed up network drive.
- Secondary responsibility within Aludyne Montague has been established for downloading, reviewing and filing the chip dryer dryer afterburner temperature reports on Aludyne Montague's backed up network drive.

Failure to Conduct Flexible Furnace Group (FG_Furn1,2) Weekly Visible Emission Observations

Duration/Dates the Violation Occurred:

- Records of Visible Emissions Observations for the furnace area vents and openings were unavailable from the week of September 2, 2019 through the week of August 12, 2022. While observations are routinely made by operators during furnace operation, observations were also previously being made and recorded on a weekly basis and recorded by Aludyne Montague's previous EHS representative. However, records of observations for the period above were not able to be recovered.

Explanation of the Causes of the Violation:

- Records were not kept or backed up by Aludyne Montague's previous EHS representative on Aludyne Montague's secured network drive, and the

computer hard drive utilized by the representative to temporarily store select records crashed after their departure.

- Aludyne Montague did not have an effective system of checks and balances in place to ensure that weekly visible emissions observations of the furnace area vents and openings would be conducted, recorded and saved on Aludyne Montague's backed-up network drive in the event of the responsible person's absence or a change in responsibilities.

Whether the Violation is Ongoing:

- No; recording of visible emissions observations recommenced on August 19, 2022.

Summary of Corrective Actions Taken:

- Aludyne Montague hired a replacement EHS Manager on August 15, 2022 with responsibility for making and recording weekly visible emissions observations. Furthermore, the Aludyne Montague Maintenance Manager is also a back-up.
- The prior recovered electronic file documenting visible emissions readings was updated to record readings and setup a corrective action log to document any required cause investigation and associated corrective actions in the event that visible emissions above 0% opacity are observed. Recording of weekly visible emissions observations was re-initiated on August 19, 2022.

Summary of Preventative Actions Taken:

- Aludyne Montague initiated establishment of a weekly assignment in its automated preventative maintenance (PM) system on October 31, 2022 which triggers printing, issuing, and tracking a weekly PM through completion of the furnace area visible emissions reading and recording task.
- Aludyne Montague commenced storage of the Visible Emissions Weekly Visible Emissions Observation and Corrective Action Log file on its network drive which is backed up daily. Storage of the file on the network commenced on August 19, 2022.

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Violation Notice Response

Please contact us with any questions or requests for additional information pertaining to this response for the cited violations.

Sincerely,
Aludyne Montague, LLC



Michael Kinney
Plant Manager

cc: Michael Wolffis, Aludyne Montague EHS Manager

Enclosures:

- Attachment 1: Furnace / Afterburner Temperature Monthly Reports
For Oct 2021 – Sep 2022
- Attachments 2: Furnace / Afterburner Temperature Daily Reports
For Oct 2021 – Sep 2022
- Attachment 3: Furnace / Afterburner Temperature 3-Hour Reports
For Oct 2021 – Sep 2022
- Attachment 4: Furnace / Afterburner Temperature Corrective Action
Reports For Oct 2021 – Sep 2022
- Attachments 5: Weekly Visible Emissions Observations Log
For Aug 19 – Oct 25, 2022
Weekly Visible Emissions Observations Corrective Action
Log Form