



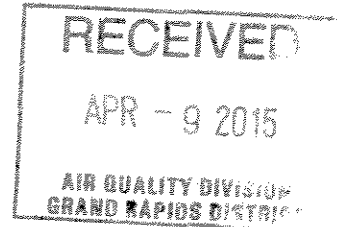
Barber Steel Foundry Corp

A Wabtec Company

Barber Steel Foundry Corporation · PO Box 305 · Rothbury, MI 49452 ·

April 8, 2015

Mr. Eric Grinstern
Environmental Quality Specialist, Air Quality Division
Michigan Department of Environmental Quality
Grand Rapids District Office
State Office Building, 5th Floor
350 Ottawa Ave NW, Unit 10
Grand Rapids, MI 49503-2341



Subject: Response to Violation Notice Dated March 19, 2015
Barber Steel Foundry Corporation SRN #1961

Dear Mr. Grinstern:

Barber Steel Foundry Corporation (BSF) operates a steel foundry at 2625 West Winston Road in Rothbury, Michigan under Michigan Department of Environmental Quality – Air Quality Division (MDEQ-AQD) Permit to Install (PTI) 12-14. BSF recently received a Violation Notice (VN) dated March 19, 2015 related to operation of the melt furnace dust collector at the facility. On February 11, 2015 BSF provided notice via email under Rules 912(4) and 912(5) informing MDEQ-AQD of operation of the melt furnace (EU-INDUCFURNEIF6) while the melt furnace collector was not fully in operating condition. This letter serves as the response requested in the in the VN to clarify the duration and cause of the melt furnace collector condition and outline BSF's actions moving forward to maintain compliance with PTI 12-14.

Duration and Causes

On December 18, 2014 BSF identified an issue with the melt furnace collector. The collector and associated control hood were not providing adequate air flow to control emissions from the melt furnace. This caused an increase in fugitive emissions on the melt deck making melt furnace operations difficult. As part of the effort to restore exhaust flow from the melt furnace hood, BSF personnel removed cartridges from the collector allowing exhaust gas to pass through the collector and restoring flow from the melt furnace hood.

BSF identified sixteen (16) shifts in 2015 during which the melt furnace operated without the melt furnace collector in proper working order. The dates of those shifts are as follows:

January 6, 7, 8, 9, 13, 14, 15, 16, 20, 21, 22, 26, 27, 28, 29 and 30

Melt operations were halted after January 30, 2015 to allow BSF to install new cartridges in the collector and restore the collector to working order. On February 7, 2015 BSF restarted melting operations and the collector has been operating as designed since that time.

Corrective Action and Future Prevention

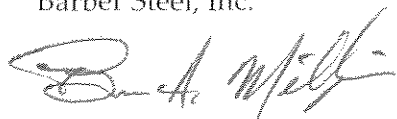
As outlined above, BSF halted melting operations in order to restore the collector to proper working order, and BSF completed the installation of new cartridges on February 6, 2015. Currently BSF is maintaining a spare set of new cartridges to facilitate a timely change should the condition of the current cartridges show signs of similar deterioration. BSF will continue to monitor pressure drop readings across the collector according to the Malfunction Abatement Plan approved by MDEQ-AQD.

Additionally, BSF has worked with ventilation design contractors to evaluate the current melt furnace hood, ductwork and collector. That evaluation indicates that the melt furnace duct work may be improperly sized for this application. BSF is currently evaluating options to permanently improve airflow through the collector. This improvement may require movement of the melt furnace baghouse stack location and MDEQ-AQD PTI permitting. BSF will notify MDEQ-AQD of proposed changes as required under PTI 12-14 and Rule 201 MAC.

Should you have any questions regarding this matter, please call me at 231-981-3933.

Sincerely,

Barber Steel, Inc.

A handwritten signature in black ink, appearing to read "Bruce Milligan". The signature is stylized and cursive.

Bruce Milligan
Plant Manager