



Barber Steel Foundry Corp

A Wabtec Company

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

October 20, 2015

Mr. Eric Grinstern
Environmental Quality Specialist
Air Quality Division
Department of Environmental Quality
State Office Building
350 Ottawa Avenue, NW, Unit 10
Grand Rapids, MI 49503-2341



Re: Barber Steel Foundry Corporation
SRN: B1961, Oceana County

Dear Mr. Grinstern:

This is in response to your Violation Notice letter, dated September 30, 2015, regarding the inspection of the Barber Steel Foundry Corporation ("BSF") facility located at 2625 West Winston Road, Rothbury, Michigan (the "Facility") conducted on September 9, 2015 by the Michigan Department of Environmental Quality ("DEQ"). The letter alleges that BSF is in violation of its Permit to Install No. 12-14 and applicable regulations for "Failure to maintain a bag leak detection system that records the output on a continuous basis." DEQ requested that BSF submit a written response to the Violation Letter by October 21, 2015.

The alleged violation related to issues that BSF encountered with respect to the data recorder attached to the bag leak detection system. BSF had been using a desktop computer (i.e., a PC) to collect and store the particulate matter loading data transmitted from the bag leak detection system using Paragon software. The data collection issues were discovered on or about June 24, 2015, when BSF's consultant, TRC Solutions ("TRC"), attempted to access the data for inclusion in the semi-annual report submitted on July 30, 2015.

Based upon BSF's investigations to date, it was discovered that there was a power outage that occurred the night of April 21, 2015 that resulted in the shutdown of the computer that was logging the data from the collection device. BSF has retained an information technology consultant who is attempting to recover data from the old PC, but those efforts have not resulted in the locating of any additional data. BSF also contacted a former employee to assist in attempting to recover any data which may have been stored, but this has not been beneficial.

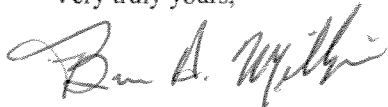
It was discovered, on or about July 30, 2015, that the cables transmitting data to the old PLC were damaged as a result of the fire that occurred on June 13, 2015. These cables were replaced on or about August 3, 2015. On or about August 8, 2015, BSF added a new recording device. This will allow for a new data collection and storage device for this information. Additionally, this data will not be sent to the old PC as the second storage location, rather it will be sent to the on-site computer server which will store the data and be backed up to the "cloud".

Attached is an annotated calendar for the months of April through August 2015 that indicates whether BSF currently has data from the bag leak detection system for each day, as well as whether the furnace was operating and the number of heats for each particular day. It is important to note that on the days for which bag leak detection system data currently is unavailable, static pressure readings from the baghouse and daily opacity readings demonstrate that the baghouse was functioning properly. Therefore, there is no indication that baghouse emissions during those time periods exceeded an applicable standard.

As noted above, BSF's ability to respond to the apparent failure of the bag leak detection system data collector was hampered by the fact that BSF was unaware that the data collector was not functioning properly. Accordingly, BSF will be adding software to the data collector that will automatically alert designated BSF contacts of a problem with the bag leak detection system itself, and also if the data recorder is not collecting and storing the required data from the system.

I trust that this letter and attachment are responsive to the information requests in the DEQ's Violation Notice. If you have any further questions, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bruce A. Milligan". The signature is written in a cursive, flowing style.

Bruce Milligan