



Rex

August 6, 2018

Mr. Rex Lane  
Michigan Department of Environmental Quality  
Air Quality Division  
7953 Adobe Road  
Kalamazoo, MI 49009  
269-567-3500



**Subject: Response to July 16, 2018 Violation Notice**

BZ015

Dear Mr. Lane,

Please accept this as the required response to the July 16th Violation Notice. The VN requires a response which includes: "the dates the violations occurred; an explanation of the causes and duration of the violations; whether violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence".

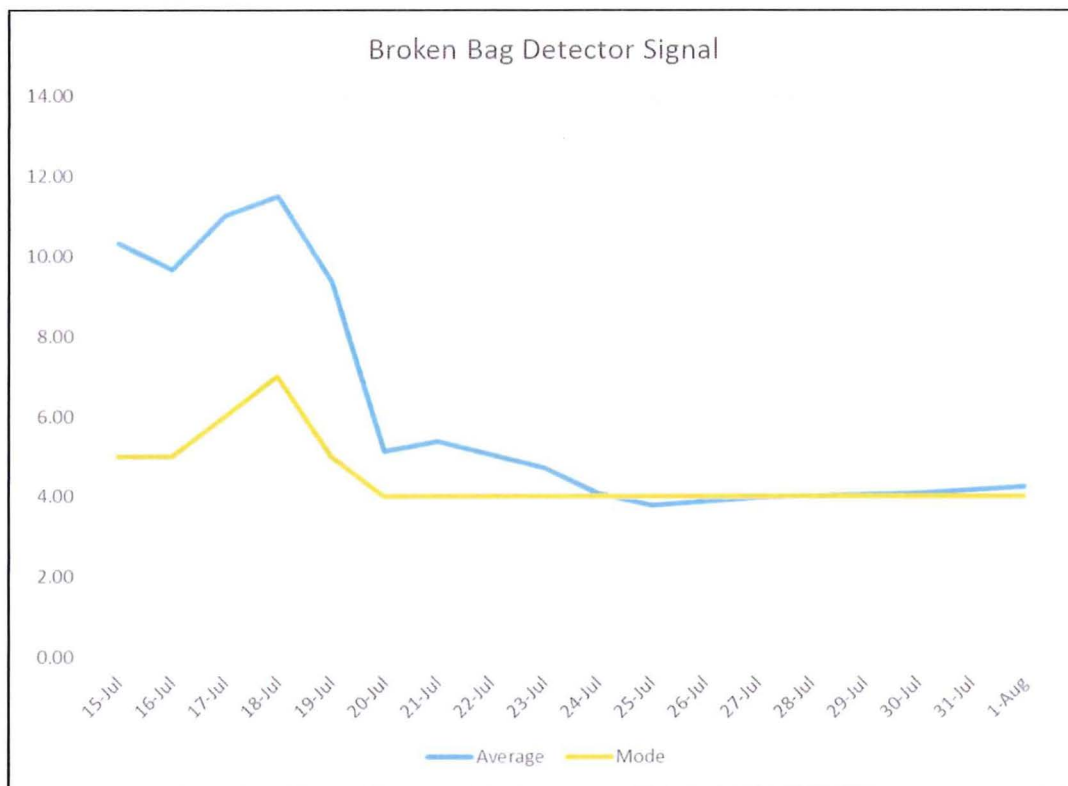
- Dates:
  - 6/21/18
    - Abnormal emission noted from N Fuller/W Dostar stack
    - Emission units associated with these dust collectors immediately shut down
    - Conducted blacklight test, during which 2 bad bags were found in the N Fuller and replaced
    - Scheduled dust collection contractor (Waltz-Holst) to come do an inspection on 6/23/18
  - 6/23/18
    - Waltz-Holst performed an inspection of the internal structures of the N Fuller
    - Deflector plate found to be in acceptable condition
    - Three additional bad bags found
    - Five bad venturies were found
    - Additional inspection to occur on July 4<sup>th</sup> shutdown
  - 7/6/18
    - Waltz-Holst found 10 total bad venturies and changed them.
  - 7/14/18
    - Waltz-Holst performed additional inspection and found 1 bad bag and 2 more bad venturies.
    - Found leak in collector housing, allowing the elements to enter the baghouse and cause internal corrosion on the clean side.
  - 7/22/18
    - Waltz-Holst came back to fix the leak found on 7/14/18.
    - During this visit, they found no broken bags or bad venturies.

*Three Rivers Gray Iron*

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- Causes and Duration:
  - On three of the inspections, a total of 17 bad ventures were found, which we believe was a major contributor to the blown bags
  - On the 7/14/18 inspection, Waltz-Holst was able to find a hole in the baghouse, which was allowing water in during rain events. We believe that this was also a contributing factor due to the internal corrosion it was causing.
- The violation is not believed to be ongoing as the apparent sources of the malfunctions have been addressed.
  - The readings from the new Bag Leak Detection System (noted below) appear to show that the problems have been resolved. The following graph shows the downward trend and eventual smoothing of the signal.



- Summary of actions taken and/or to be taken and associated dates:
  - Please see the previous sections.
- Steps being taken to prevent a recurrence:
  - Continue to conduct daily visible emission readings
  - Continue to monitor and record differential pressure of the baghouse
  - Installation of a Bag Leak Detection System on the stack associated with the N Fuller.
    - We have recently determined the appropriate setpoints for the BLDS alarm. The BLDS has been installed for a period of time long enough to establish a good baseline with which to set the alarm.

Per our prior communications, MTI will be investing substantial resources in installing network-capable bag leak detection systems on all baghouses at TRG by the end of 2019 to provide additional off-site monitoring and alarm capability.

As always, please feel free to contact me at any time with questions or concerns.

Respectfully,

A handwritten signature in black ink, appearing to read 'Dan Plant', with a long horizontal stroke extending to the right.

Dan Plant  
Corporate Environmental Manager  
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Metal Technologies of Indiana, LLC

cc: Ms. Jenine Camilleri, DEQ

