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October 21, 2021

Ms. Amanda Chapel
Michigan Department of Environmental Quality
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009
269-910-2109

Subject: Response to October 18, 2021 Violation Notice

Dear Ms. Chapel,

Please accept this as the required response to the Oct 18th Violation Notice. The VN requires a response which includes: "the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence". The following narrative has been created to address these requirements as clearly and concisely as possible. Please call or email me with any questions or concerns at any time.

Dates:

- 8/13/21
 - The West Dostar bag leak detection system (BLDS) alarmed at 12:00PM. At 12:30PM, the facility acknowledged the alarm and shut down the dust collector and conducted a blacklight test to determine if there was a leak in the collector. Two bags were noted as having *potential leaks** and replaced prior to restarting the collector. A full bag changeout was scheduled for the following weekend based on the BLDS alarm combined with existing in-service time of the West Dostar's remaining bags.
- 8/14/21
 - TRG's ventilation contractor, Waltz-Holst Blowpipe Co, Inc., conducted a full bag replacement of the West Dostar. Waltz-Holst deposited the 1,032 bags into open top roll-off containers to await removal by Waste Management, our byproduct vendor.

*Leaks are noted as "potential" due to the inexact nature of blacklight testing. It can be very difficult to find leaks due to the small amount of dust that can set off the BLDS. In other words, a leak can be so small that very little fluorescent powder makes it through. This can make it difficult for the inspector to determine if there is an active leak. Our normal process is to err on the side of caution and replace any bag that *might* have fluorescent powder on it.

Three Rivers Gray Iron

429 4th Street • Three Rivers, MI 49093
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Causes and Duration:

- TRG believes the issue stems from the storage of the old dust collector bags in the open top roll-off containers coupled with unfavorable high-wind weather conditions. TRG has completed countless dust collector rebagging efforts and has never encountered this issue before, however, TRG also has not experienced the combination of open-top storage combined with unfavorable gusting wind before to its knowledge. The bag campaign is typically 3-5 years for a dust collector of this type. This was year 4 of the cycle.
- TRG believes the problem can be limited to the dates from when the bags were changed out (8/13) and when Waste Management removed them (8/16).

Summary of Actions to Correct Violation and Prevent Reoccurrence:

- TRG has instituted a new Work Instruction (attached) regarding the handling of waste dust collector bags. TRG started preparing the Work Instruction shortly after being alerted to the issue and identifying a cause. The Work Instruction has been finalized as of October 28, 2021.

TRG takes environmental stewardship very seriously. Due to this belief, the decision was made to change all bags in the West Dustar when the BLDS alerted us that some of the bags may have been weakening. Unfortunately, the decision to proactively protect the environment and community by installing new bags ended up causing a problem itself.

Please do not hesitate to reach out with any additional questions, comments, or concerns. I can be reached at 260-920-2137 or dplant@metal-technologies.com at any time.

Respectfully,

Dan Plant
Director of Environmental Engineering
Metal Technologies of Indiana, LLC

cc: Ms. Jenine Camilleri, Enforcement Unit Supervisor, EGLE AQD

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Dust Collector Bag Changeout

DCN:

WI-EN-05

Revision Date:

10/21/2021

Page 1 of 1 Pages

1. General

- 1.1. This Work Instruction provides the requirements for handling used/spent/old dust collector bags to prevent fugitive dust from leaving used bags while awaiting disposal.
- 1.2. This WI must be followed to maintain compliance with state obligations and TRG's Environmental Management System.

2. Process – PLAN AHEAD

- 2.1. Used bags must always be stored in a manner which prevents any fugitive dust from escaping.
- 2.2. Options to prevent fugitive dust from escaping:
 - 2.2.1. Covered roll-off container from waste vendor
 - 2.2.2. Open-top container with secure tarp or other covering completely sealing bags in the container.
 - 2.2.3. In the event a covered roll-off container or cover is not available, store open-top container indoors.
 - 2.2.4. Wet the old bags if windy conditions exist during bag changeouts regardless of storage method to prevent fugitive dust.
- 2.3. Containers must be removed from TRG as soon as possible to eliminate the risk of fugitive dusts escaping the facility. Use every effort to plan removal of old bags prior to conducting a changeout.

3. Associated documents/resources

- 3.1. Environmental SharePoint Site

Revision Date	Description of Changes
10/21/2021	Document Creation