



May 31, 2016



Ms. April Lazzaro
Senior Environmental Quality Analyst
Michigan Department of Environmental Quality
Air Quality Division
350 Ottawa Avenue, NW, Unit 10
Grand Rapids, MI 49503-2341

Re: HarbisonWalker International, Inc.
White Cloud Plant
SRN: B5777
Violation Notice Response

Dear Ms. Lazzaro:

We have received your Violation Notice, dated May 17, 2016, for the malfunction of the catalytic oxidizer controlling emissions from the ovens at the White Cloud Plant of HarbisonWalker International, Inc. We would like to provide the following responses to the information requested in the letter.

The dates the violations occurred:

April 18, 2016

An explanation of the causes and duration of the violations:

The catalytic oxidizer experienced a burner flame out. The temperature was below the permit minimum temperature for a little over 8 hours.

Whether the violations are ongoing:

The violations are not ongoing. The burner was inspected immediately upon discovery and restarted.

A summary of actions that have been taken and are proposed to be taken to correct the violations and the dates by which the actions will take place:


When the burner was found to be out, a thorough inspection was conducted immediately and it was restarted. No specific reason was found for the flame out.

Steps being taken to prevent a reoccurrence:

In order to prevent similar incidents in the future, a weekly PM to clean the flame detector eye has been created. An audio alarm was installed, the existing visual alarm at the ovens/incinerator which indicates temperature drop in the incinerator was revised and alarms will be logged into the control system. To help plant personnel determine that a problem has been experienced with the catalytic oxidizer and to minimize emissions, all employees who have job responsibilities at or near the visual indicators were trained on what to look for and the proper response to audio and visual incinerator temperature alarms. A plant communication meeting was held with all plant personnel to review this issue and the corrective actions needed to avoid future reoccurrences.

Hopefully the above information is sufficient. If you have additional questions or need further information please contact me at (412) 375-6332.

Sincerely,

A handwritten signature in black ink that reads "Bruce E. Morgan". The signature is written in a cursive style with a long, sweeping underline.

Bruce E. Morgan
Sr. Environmental Engineer