

July 1, 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
June 28, 2016 Malfunction

Dear Ms. Lazzaro:

In follow to our notice of June 28, 2016, concerning 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 information.

The dates the violations occurred:

June 23, 2016

An explanation of the causes and duration of the violations:

The flame protector relay malfunctioned. It was inspected immediately upon discovery and replaced. Total duration was approximately 1 hour and 45 minutes.

Whether the violations are ongoing:

The relay was inspected immediately upon discovery and replaced. Normal operations resumed within approximately 1 hour and 45 minutes.

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:

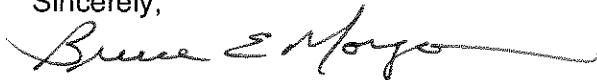
The relay was inspected and replaced immediately upon discovery, correcting the violation as expeditiously as possible.

Steps being taken to prevent a reoccurrence:

In order to prevent similar incidents in the future, a weekly PM has been created to inspect the relay for potential signs of failure or fatigue. As specified in our letter of May 31, 2016, an audio alarm was installed, the visual alarm at the ovens/incinerator which indicates temperature drop in the incinerator was revised and alarms are now 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. Finally, in order to prevent excessive emissions due to problems with the incinerator, the ovens/dryer will be shut down immediately upon the discovery of a malfunction.

Hopefully the above information is sufficient. If you have additional questions or need further information please contact me at (412) 375-6632.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce E. Morgan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bruce E. Morgan
Sr. Environmental Engineer