

Date the Violations Occurred on -8/19/21

Violation Causes- WKW was not aware that the violations documented in our Violation Notice Letter were taking place. WKW conduct an internal investigation and found issues with internal processes that were allowing the violations to occur. Actions that were taken to correct the violations include the following. All violations will be corrected before 10/7/21.

- 1- A mass balance calculation will be conducted for Nitric Acid, Phosphoric Acid, and Sodium Hydroxide emissions tracking and record-keeping for PTI #458-89C, special conditions 1, 2, and 3. The mass balance calculation has been placed into monthly quantity tracking documentation as a calculation step that is required when recording monthly purchases of Nitric Acid, Phosphoric Acid, and Sodium Hydroxide. This will allow us to track and document emission rates and will prevent reoccurrences on absent emission records in the future.
- 2- Daily pressure drop records will be kept for PTI #11-20. This will be completed via a daily pressure drop log. An example pressure drop log has been included with corresponding documentation. Daily pressure drop readings have been included into our internal E-Maint program as a required daily action for completion. This will prevent reoccurrences on lack of pressure drop records.
- 3- A Malfunction Abatement Plan has been included for PTI #11-20 to include an entire preventive maintenance program. The Malfunction Abatement Plan has been included with this documentation to include a complete preventative maintenance program for PTI# 11-20. The program will be placed into our internal E-Maint program for documentation and record-keeping purposes. The maintenance Supervisor and Manager will be responsible for the preventative maintenance program.
- 4- A notification on the completion of the installation of the heat treat oven PTI #11-20 has been included with corresponding documentation. This will be in the form of the initial released documented work instructions dated 8/25/2020.

If there are any questions in regards to the above actions please contact Luke Ryskamp, Environmental Health, and Safety Manager.

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Signature:  10/6/21

