

PRESS FORGE CO.

7700 JACKSON STREET • PARAMOUNT, CALIFORNIA 90723

Phone: (562) 531-4962 • Fax: (562) 531-4826

December 5, 2016

Ms. Susan Nakamura (SNakamura@aqmd.gov)
Acting Assistant Deputy Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765-4182

SUBJECT: Control of Fugitive Dust Emissions

Dear Ms. Nakamura:

I am the General Manager of the Press Forge facility located in Paramount, CA. South Coast Air Quality Management District is currently developing a proposed Rule 1430 to control metal dust emissions from grinding operations at forging facilities. At your December 1, 2016 meeting about the rulemaking effort, Press Forge was identified as a facility that was conducting grinding outdoors. I wanted to correct the record and make sure that you are aware that Press Forge ceased all outdoor grinding on or before November 10th. While the majority of our grinding has occurred indoors for as long as I have worked at the facility, there was some small hand grinding conducted outside up until that time. That is no longer the case. Now all grinding is conducted indoors with emissions controlled by baghouses and the outdoor hand grinding stations have been permanently removed.

I also wanted to ensure that you were aware of all the other improvements at the facility to reduce emissions related to our grinding operations. Press Forge is in the process of constructing a new building that will enable us to conduct all hand grinding operations within an enclosed space under negative pressure and certified as a total enclosure. Exhaust from the new hand grinding facility will be routed to baghouses with HEPA secondary filtration. This structure is being built with careful attention to your draft rule language to ensure that we meet or exceed all of the anticipated requirements. We expect the new hand grinding facility to be fully operational by late spring of 2017--well in advance of when the rule could require such upgrades. In the interim, in order to minimize the potential for fugitive dust, we are in the process of implementing the following additional procedures:

- Prohibiting use of compressed air for cleaning purposes as indicated in Rule 1430
- Prohibiting use of dry sweeping for cleanup as indicated in Rule 1430
- Purchasing additional HEPA vacuums to replace broom sweeping and facilitate housekeeping as indicated in Rule 1430
- Utilization of a mobile wet sweeper in place of the existing mobile dry sweeper
- Limiting cleaning of areas potentially impacted by metal dust to wet methods or HEPA vacuum
- Implementing enhanced maintenance procedures using the HEPA vacuums and wet cleanup to minimize the suspension of dust as well as trackout
- Training our workers on the importance of minimizing fugitive dust emissions

11/21/15

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We believe that our process of constant improvement is resulting in positive change and that we are successfully decreasing fugitive dust emissions from our facility.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Ortiz". The signature is stylized and cursive.

Robert Ortiz

cc: Kyle Nelson
Tom Wood