ATTACHMENT A

Projects with Status and Completion Dates

Modified November 3, 2014

No.	Control Strategy	Plant	Pollutants primarily				Completion Date **Original information as signed November 2011	Method of Confirmation	Status **Updated status as of November 2014
			PM	metallic HAPs	organic HAPs	odor			
1	Improve capture and control of Doghouse and Side Floor PCS fugitives. Ensure cooling in the Doghouse occurs in the controlled section of the building.	MP	x	x	x	x	12/31/13	Approved Tester to perform Emission Test on the outlet of the new baghouse(s) to measure emissions of particulate. Approved Tester to perform test on the inlet to the new baghouse(s) to measure amount of particulate captured by the new system. Also, for a test period of one month, ESCO will weigh each container of dust collected by the new baghouse(s) and record the amount of particulate removed and correlate it to tons of metal poured in the Doghouse over the same period. ESCO will repeat this weigh test two years after installation of the new baghouse(s) to confirm that the baghouse(s) continues to achieve a substantial reduction in emissions.	Completed installation of two new collectors to capture Pouring and Shakeout emissions on December 23, 2013 and tested in January 2014.
2	Add control to Air Arc Cutting- Lower Finishing	MP	x	x			Complete	For a test period of one month, ESCO will weigh each container of dust collected and record the amount of particulate removed.	Completed installation of new dust collector for Bay 2 Air Arc and routed emissions from Bay 1 Air Arc to existing collector prior to GNA signing. Weighed dust and reported to NAC in January 2013.
3	Add control to Air Arc Cutting- Upper Finishing	MP	x	x			Complete	For a test period of one month, ESCO will weigh each filter removed from the collection device and record the amount of particulate removed.	Completed repair of fume extraction unit for chain table, weighed dust in May 2012 and reported to NAC in November 2013.
4	Seal leaks and openings on P3 Pouring Cooling Shakeout	P3	x	x		x	Complete	Already completed. ESCO will inspect integrity of cooling room enclosure at least once annually and repair as necessary. ESCO will keep a record of each inspection and the repairs made. Neighbor Groups may audit inspection records and inspect the cooling room enclosure. ESCO will include a summary of inspections and repairs in the annual report to the NAC.	Completed prior to GNA signing and regularly inspected.
5	Elect either a. or b.	P3			x	x	3/31/15		
	a. Install thermal oxidation or alternative control technology on sand coating pug mill.							a. Approved Tester to perform Emission Test for phenol on inlet and outlet of the control device for one test run.	Not Applicable
	b. Substitute a low phenol binder system for the binder system on which the phenol emissions factors in the Title V Permit are based. The new low phenol binder system will achieve a combined reduction in phenol emissions from all Plant 3 sources of at least 35 to 40% .							b. Approved Tester to perform source tests for phenol on the exhaust of the pugmill and on the mold and core making vent. ESCO may elect to also perform a source test on the pouring cooling and shakeout vent if necessary to demonstrate the target percentage reduction.	New low-phenol binder system in use and required reduction achieved. DEQ approved tests on January 24, 2014.
6	Continue alternative binder studies, especially for chain castings.	MP			x	x	Continuous	ESCO will report on binder changes in its annual report to the NAC.	New binder system in use in the Chain Room as a result of binder studies.
7	Install bag leak detection on EAF and AOD baghouses.	MP & P3	x	x			12/31/13	Neighbor Groups may inspect system after installation and startup. Neighbor Groups may audit system records. If ESCO cannot correct a problem indicated by the bag leak detection system within 10 days of discovery, ESCO will notify the NAC in the same manner and at the same time that it is required to notify DEQ under the Proposed Permit Terms.	Bag Leak Detection probes installed on Main Plant EAF and AOD baghouses and Plant 3 EAF and Pouring Cooling Shakeout Baghouse by December 17, 2013.
8	Modify operational specifications to limit door and other openings to improve capture on EAF and AOD processes.	MP & P3	x	x			Complete	ESCO will inspect EAF and AOD areas during its monthly fugitive emissions inspections and maintain records of its inspections. Neighbor Groups may audit the inspection records and inspect EAF and AOD areas.	Overhead Door Plan modified prior to GNA signing with inspections monthly.
9	Add/improve procedures on EAF operations that directly affect capture. Evaluate additional control mechanisms for EAF capture systems and high canopy hood dampers. Optimize operating procedures and provide routine training.	MP & P3	x	x			12/31/12	Neighbor Groups may inspect operation to confirm that revised operating procedures are being followed.	Procedures were reviewed and modified, with DEQ notified of completion on December 27, 2012.
10	Take corrective actions to reduce fugitives on thermal sand reclaim baghouse by installing course fraction separator to improve collection and reduce wear on baghouse.	P3	x				Complete	ESCO will inspect baghouse monthly and take corrective action as needed. ESCO will maintain records of monthly inspections and corrective action.	Installed separator in January 2011, first replacement in June 2012, replaced again in July 2013 by a longer term liner.

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11	Identify and implement operating changes to reduce emissions at dump back and transfer points.	MP	**x**	**x**			12/31/12	Approved Consultant to conduct qualitative visual observations before and after operating changes. Neighbor Groups may participate in observations.	Procedures were modified to reduce use of dump back. Consultant observed and issued report on July 25, 2012.
12	Identify and implement operating changes to reduce emissions at dump back and transfer points.	P3	**x**	**x**			12/31/12	Approved Consultant to conduct qualitative visual observations before and after operating changes. Neighbor Groups may participate in observations.	Procedures were modified to reduce use of dump back. Consultant observed and issued report on July 25, 2012.
13	Conduct study to quantify emissions from thermal sand reclaim and to determine if thermal sand reclaim can be operated at recommended temperature.	P3			**x**		12/31/14	Approved Tester to test temperature of sand reclaimer exhaust to confirm operating at sufficient VOC destruction temperatures.	In process
14	Modify operations at the AOD to improve capture.	MP	**x**	**x**			3/31/15	Neighbor Groups may inspect operation to confirm that revised operating procedures are being followed.	In process
15	Ensure operators use control equipment at workbench stations in finishing area.	MP	**x**	**x**			Complete	Neighbor Groups may inspect operation to confirm that revised operating procedures are being followed.	Additional fume extraction points added and procedures modified prior to GNA signing.
16	Develop and implement Incident (Atypical) Investigation Plan.	MP & P3	**x**	**x**	**x**	**x**	9/31/14	NAC will review documentation for a completed investigation.	Investigation plan developed and implemented by September 25, 2014.
17	Perform an engineering study of feasible capture and control methods for emissions from pour points in slinger bay, including estimates of potential reductions. Alternatively, ESCO may propose a different study or emission reduction project, which it shall implement instead of the slinger bay study, if approved by the NAC.	MP	x	x	x	x	4/30/17	ESCO will provide completed study report to Neighbor Groups.	In process