SMITH FOUNDRY
Company Inc

December 19, 2023

Commissioner Katrina Kessler
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155

Dear Commissioner Kessler:

I am writing in response to your letter dated December 8, 2023.

Smith Foundry Company Inc. (Smith Foundry) appreciates your recognition of our cooperation and commitment to East Phillips residents. As you know, we are new to the neighborhood, having acquired the facility just a year ago in December 2022, but in this short period we have worked diligently to establish relationships in the community, respond to any neighborhood concerns (including by sharing information and attending community meetings), and improve the company and its operations.

Most importantly, we have made significant investments in our building, equipment, and processes to ensure the foundry is operating safely and rectify the neglect left by the previous owner. For example, we have replaced a portion of the roof, sealed holes and gaps on machines, tanks, ducts, and hoses, secured windows and doors, and repainted the building. We have also installed new end covers and skirts for ducts and equipment, curtains on doorways, and canvas tarps on machines, cleaned ducts, floors, walls, and ceilings, and repaired hoods and broken air lines to machines. In addition, we have hired a new maintenance manager, provided regular training on dust collector inspection and maintenance for all staff, regularly changed filters, and completed weekly preventative maintenance on the equipment. All of these efforts are designed to improve the operations and environmental compliance measures at our facility.

Smith Foundry will continue to provide information to the Minesota Pollution Control Agency (MPCA) and the community to build trust and demonstrate that the foundry operates in compliance with its permit and the applicable rules and regulations. To that end, we would like to explore forming a committee comprised of members of the community, the MPCA and Smith Foundry to help facilitate a transparent and productive approach to engaging the community in the air permitting process. We look forward to discussing this idea with the MPCA and the community.

We also agree to provide an air emissions testing, monitoring, and reporting plan (EMP). This letter serves as Smith Foundry's response and proposed timeline to develop an EMP, as requested by MPCA. We have already initiated conversations with engineering and source testing firms with extensive experience with air quality testing and monitoring to help us prepare the EMP. We plan to select a firm by the end of the month or early January. Starting in January 2024, we will provide updates to MPCA at the end of each month regarding our progress in preparing the EMP. And we will meet your timeline by submitting the EMP by mid-April 2024.

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With respect to MPCA's requests related to lead, we would like to note that, for unknown reasons, the previous owner of our facility appears to have used the maximum allowable lead emissions under EPA guidelines for reporting his company's lead emissions. We strongly believe that these reported emissions are *not* reflective of the actual emissions from Smith Foundry. In fact, in November 2023, Smith Foundry submitted a sample of the two raw materials used at the foundry—pig iron ingots and steel clips—as well as a casting that was produced at the foundry from those materials, to Element Materials Testing to confirm that the raw materials and the casting do not contain any detectable amount of lead. Enclosed with this letter are the results from those tests. In our 2023 air emission inventory (to be filed in 2024), we will discontinue the previous owner's approach to reporting lead emissions; instead, the lead emissions data will reflect the foundry's actual lead emissions, as determined through the stack testing that took place at the foundry earlier this month.

In addition to the raw materials and casting testing, the results of the stack testing that Smith Foundry conducted earlier this month will provide further evidence that lead emissions are not an issue. Smith Foundry agrees to share with MPCA the results of the stack testing when we provide the results to the U.S. Environmental Protection Agency.

Finally, I confirm we are assessing the workplace conditions at Smith Foundry and discussing the same with the local Teamsters. Also, as you may be aware, Minnesota OSHA recently visited the facility and we look forward to hearing from them and addressing any of their concerns. Safety is a top priority at Smith Foundry and we are committed to ensuring the well-being of our employees.

Sincerely,

Adolfo Quiroga

Adolfo Quiroga
President

Enclosure

element

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Smith Foundry Company
1855 E. 28th Street
MINNEAPOLIS, MN 55407

TEST CERTIFICATE — EAR-CONTROLLED DATA

Date: 11/20/2023 Rev. 1 12/11/23
Purchase Order Number: 90978
Work Order Number: SMI041-11-07-78537-1
Rev. 1

Part No.: Sample 1
Material: Pig/Ingot
Specification: NS

CHEMISTRY

		Results %		
Element		**XRF**	**OES**	**ICP**
Mn	=	<LOD	0.01	0.01
Cr	=	0.02	0.02	0.04
Ni	=	<LOD	0.02	0.03
Cu	=	<LOD	0.01	0.01
Pb	=	<LOD	<0.01	<0.0001
Cd	=	<LOD	NA	<0.0010

Chemical analysis by optical emission spectrometry performed in accordance with SOP CHEM-10
Chemical analysis by X-ray fluorescence using Thermo Scientific Niton™ XL3t GOLDD Portable X-ray Fluorescence (XRF) Analyzer, SN 94944, verified before use
Chemical analysis by ICP per SOP 17.00, trace elements were determined by AA/Graphite per SOP 10.10 performed by Element Materials Technology, Huntington Beach, CA, an A2LA accredited laboratory

DATA PRESENTED FOR INFORMATION ONLY

LOD = Limit of Detection
NA = Not analyzed – not in instrument calibration

Respectfully Submitted

Sierra Walker
Associate Chemist
Materials Testing and Analysis Group

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Date: 11/20/2023 Rev. 1 12/11/23
Purchase Order Number: 90978
Work Order Number: SMI041-11-07-78537-1
Rev. 1

Part No.: Sample 2
Material: Casting 2" x 3" x 1"
Specification: NS

CHEMISTRY

		Results %		
Element		**XRF**	**OES**	**ICP**
Mn	=	0.32	0.28	0.28
Cr	=	0.05	0.04	0.05
Ni	=	<LOD	0.04	0.04
Cu	=	0.29	0.21	0.25
Pb	=	<LOD	0.01	<0.0001
Cd	=	<LOD	NA	<0.0010

Chemical analysis by optical emission spectrometry performed in accordance with SOP CHEM-10
Chemical analysis by X-ray fluorescence using Thermo Scientific Niton™ XL3t GOLDD Portable X-ray Fluorescence (XRF) Analyzer, SN 94944, verified before use
Chemical analysis by ICP per SOP 17.00, trace elements were determined by AA/Graphite per SOP 10.10 performed by Element Materials Technology, Huntington Beach, CA, an A2LA accredited laboratory

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Sierra Walker
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Date: 11/20/2023 Rev. 1 12/11/23
Purchase Order Number: 90978
Work Order Number: SMI041-11-07-78537-1
Rev. 1

Part No.: Sample 3
Material: Slip/Scrap Cutting 1" x 6" x .25"
Specification: NS

CHEMISTRY

		Results %		
Element		**XRF**	**OES**	**ICP**
Mn	=	0.79	0.79	0.83
Cr	=	0.03	0.03	0.03
Ni	=	<LOD	0.01	0.01
Cu	=	0.02	0.02	0.02
Pb	=	<LOD	<0.01	<0.0001
Cd	=	<LOD	NA	<0.0010

Chemical analysis by optical emission spectrometry performed in accordance with SOP CHEM-10
Chemical analysis by X-ray fluorescence using Thermo Scientific Niton™ XL3t GOLDD Portable X-ray Fluorescence (XRF) Analyzer, SN 94944, verified before use
Chemical analysis by ICP per SOP 17.00, trace elements were determined by AA/Graphite per SOP 10.10 performed by Element Materials Technology, Huntington Beach, CA, an A2LA accredited laboratory

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12/11/23 Rev. 1: Fixed decimal error on sample 1.

Respectfully Submitted

Sierra Walker
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