

PROPOSED EXIDE TOXIC AIR CONTAMINANTS REDUCTION PROJECT

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INTRODUCTION

Exide Technologies is proposing to reduce toxic emissions of arsenic, benzene and 1,3-butadiene to comply with the recent amendments made to SCAQMD Rule 1420.1 - Emission Standards for Lead and Other Toxic Air Contaminants from Large Lead-Acid Battery Recycling Facilities, as well as to assure compliance with requirements in SCAQMD Rule 1402 - Control of Toxic Air Contaminants from Existing Sources, including the Revised Final Risk Reduction Plan. This will be accomplished by ensuring exhaust gas streams containing high levels of arsenic emissions are vented to appropriate air pollution control systems capable of controlling arsenic emissions which exist in gaseous or unfilterable form. The proposed project will also control gas streams containing gaseous organic air contaminants, carbon monoxide, and oxides of sulfur which previously escaped control because they were vented only to dry filter media or were emitted inside the building enclosure due to a lack of sufficient negative pressure in the reverberatory and blast furnaces. These modifications constitute a “project” as defined by CEQA (California Public Resources Code [PRC] §21000 et seq.). Since the SCAQMD has primary approval authority over the proposed project, SCAQMD is the appropriate lead agency under CEQA.

Pursuant to CEQA Guidelines §15070, the SCAQMD prepared a Draft Mitigated Negative Declaration (MND) and distributed a Notice of Intent to adopt the Draft MND (CEQA Guidelines §15072) to responsible public agencies and interested parties for review and comment. The Draft MND was distributed for a 30-day public review and comment period beginning on October 16, 2014, and ending on November 14, 2014. No comment letters were received from the public relative to the Draft MND. After the close of the public comment period, a Final MND was prepared for certification by the SCAQMD’s decisionmaking body.

There are potentially significant adverse impacts to air quality, and greenhouse gases, and hazards and hazardous materials with construction of the proposed project. All significant adverse impacts, however, can be mitigated to less than significant levels.

Pursuant to CEQA Guidelines §15075(b) the Notice of Determination prepared for a MND project that has identified potentially significant effects that would be mitigated to a point where no significant effects would occur must include a statement indicating whether mitigation measures were made a condition of the approval of the project. Further, when changes or alterations have been required or incorporated into a project that mitigate or avoid the significant effects, the public agency is required to adopt a Mitigation Monitoring and Reporting Plan (CEQA Guidelines § 15097) for the changes made, in order to ensure compliance during project implementation.

The following sections of this document describe the proposed project and identify the significant adverse impacts that can be mitigated to below a significant level. Since all significant adverse effects can be mitigated to less than significant levels as identified in the Final MND and the Mitigation Monitoring and Reporting Plan, a Statement of Findings and a Statement of Overriding Considerations are not required for this project.

SUMMARY OF THE PROPOSED PROJECT

Exide is proposing to reduce toxic air emissions of arsenic, benzene and 1,3 butadiene by installing new equipment and modifying existing equipment, as summarized in Table 1-1.

Table 1-1 Summary of Proposed Project

Equipment Installation
<ul style="list-style-type: none"> • A new venturi and tray type wet scrubber (C203 and C202) would be installed to serve the main air pollution control system (APCS) for the blast furnace. The existing tray type (Neptune) scrubber (C43 and C42) will continue to service the reverberatory furnace. The existing Neptune scrubber stack and support structure would be replaced with a new stack and structure which would also service the new scrubber.
<ul style="list-style-type: none"> • Repurposed Baghouse No. 2 (Device C41) will be connected at the outlet of the new RTO (Device C205) and new pre-filtering baghouse to control the blast furnace charge hoods and thimble enclosure emissions. The repurposed baghouse will then be vented to the new scrubber to reduce the emissions of arsenic and SOx.
<ul style="list-style-type: none"> • Another new RTO (Device C199) would be installed on the outlet of the reverberatory furnace feed dryer APCS to reduce the emissions of toxic organic gases.
<ul style="list-style-type: none"> • Secondary high efficiency particulate air (HEPA) filtration would be installed downstream of the MAC baghouses to reduce particulate emissions containing lead, arsenic and other toxic metals.
<ul style="list-style-type: none"> • Installation of a radar-based charge level sensor within the blast furnace and temperature sensor at the top of the blast furnace to measure the feed burden within the furnace.
Equipment Modification
<ul style="list-style-type: none"> • The blast furnace thimble ventilation hoods (previously connected to the hard lead ventilation system) are being re-routed to the main APCS serving the blast furnace, which includes the new RTO (Device C205) and new scrubber (C203 and C202). The existing baghouse blower (250 brake horsepower (bhp)) would be replaced with a larger blower (450 bhp). A re-purposed baghouse, previously attached to the reverberatory furnace APCS, and now serving the blast furnace APCS, will also receive a new 450 bhp blower.
<ul style="list-style-type: none"> • The enclosure around the blast furnace charge area will be enhanced with additional ventilation air flow to serve as a secondary hood to capture any gases that could potentially escape the charge isolation door by the hoods at the top of the enclosure.
<ul style="list-style-type: none"> • The ventilation hood connected to the hard lead ventilation system serving the slag tap of the blast furnace would be enlarged and redirected to the new blast furnace baghouse that would be routed to the new scrubber.
<ul style="list-style-type: none"> • The existing ram feeding mechanisms on the reverberatory furnace would be replaced with screw feeders to reduce the potential for arsenic and organic-bearing process gases to be drawn into the soft lead ventilation system pickup hood or discharged into the smelting building atmosphere.

- The ventilation ducting serving two refining kettles would be removed from the hard lead ventilation system and redirected to the new blast furnace baghouse that would be routed to the new scrubber (C203 and C202).

In addition, because the proposed Revised Final RRP requires the new RTO, the Construction and Activity Mitigation Plan was also revised in August 2014 to include construction mitigation regarding the installation of the new RTO on the blast furnace charge hood. The applications of the measures are expected to ensure that concentrations remain within permissible levels by imposing the described requirements on the maintenance activity and the abatement of work activities, if concentrations exceed permissible levels. Mitigation measures have been added to explicitly require that the new RTO comply with the Plan. Those modified portions of the August 2014 Construction and Activity Mitigation Plan have been incorporated in the Final MND as mitigation measures MMAQ-01 and MMHAZ-01.

SIGNIFICANT ADVERSE IMPACTS WHICH CAN BE REDUCED BELOW A SIGNIFICANT LEVEL

The Final MND identified two potentially significant adverse impacts that can be reduced to a level of insignificance: 1) potentially significant cumulative adverse air quality impacts from construction activity of the new RTO on the blast furnace charge hood; and 2) potentially significant adverse impacts to hazards and hazardous materials associated with excavation and disposal of potential contaminated soil.

Air Quality and Greenhouse Gas Emissions

Due to compliance issues and as a result of an action brought by the SCAQMD in front of the SCAQMD Hearing Board, Exide prepared a Construction and Activity Mitigation Plan, dated July 2014. A July 2014 Construction and Activity Mitigation Plan was incorporated into an Order for Abatement (Case No. 3151-32) which was issued and made enforceable by the SCAQMD Hearing Board on July 10, 2014, pursuant to Health and Safety Code section 42451(b). The plan details how Exide will control and monitor fugitive metal TAC dust during construction and other plant activities. However, the August 2014 revision of the Final Risk Reduction Plan has not yet been incorporated into the Construction Activity Mitigation Plan and approved by the SCAQMD Hearing Board for inclusion into the Order for Abatement. Since the July 2014 Construction Activity Plan does not include the RTO on the blast furnace charge hood, the construction and installation requirements for this RTO are included in the Final MND as mitigation measures to ensure enforceability (the July 2014 Construction Activity Mitigation Plan is enforceable through the Hearing Board). Hence, mitigation measures, MMAQ-01 and MMAQ-02, have been crafted to reflect the August 2014 Construction Activity Mitigation Plan requirements for the blast furnace charge hood's new RTO construction.

MMAQ-01 – Prior to removal of the existing floor and underlying soil to allow installation of the foundations for the new Blast Furnace RTO and cartridge filter baghouse, Exide shall:

- A. Conduct activities within a building under negative pressure.

- B. Thoroughly clean the existing floor using HEPA vacuums followed by washing with potable water.
- C. Require the construction contractor to cut the concrete using wet methods to minimize generation of dust. The concrete being removed must be kept damp to minimize the generation of dust during the concrete demolition and removal activities.
- D. Apply a fine water mist directly on the demolition hammer point during the demolition activities and excavation activities.
- E. Capture and properly treat all water used for washing the floor and for other uses to prevent a secondary means of fugitive emissions into the air.

MMAQ-02 – Prior to the installation of the Blast Furnace RTO and cartridge filter baghouse, Exide shall:

- A. Conduct activities within a building under negative pressure.
- B. Wash all removed materials with potable water prior to placement into a container for proper offsite disposal or recycling.
- C. Place the scrap into a rolloff container that is staged inside of the total enclosure building.
- D. Cover the roll off container when not in use.
- E. Wash the exterior of the container with potable water and tarp the container prior to removal to outside of any enclosure buildings.

With the mitigation measures MMAQ-01 and MMAQ-02, construction TAC emissions are expected to be less than significant. All construction related activities to the new RTO would have the same construction controls as expected for the new RTO on the outlet of the rotary dryer, which was included in the July 2014 Construction Activity Mitigation Plan included Order for Abatement (Case No. 3151-32) and is expected to ensure that concentrations remain within permissible levels by imposing the described requirements on the maintenance activity and the abatement of work activities, if concentrations exceed permissible levels.

Hazards and Hazardous Materials

Based on DTSC's Corrective Action Consent Order and the DTSC Memo, the following mitigation measure has been created to ensure the reduction of potential hazardous materials impacts from any contaminated soil that may be encountered during excavation activities related to laying the foundations for control equipment, to a level below significance.

MMHAZ-01 – During the excavation phase of the proposed project, Exide shall:

- A. Notify DTSC at least 72 hours prior to each excavation.
- B. Identify, sample, characterize, handle, segregate, store, and dispose of excavated soils pursuant to local, state, and federal regulations and per the DTSC approved RFI Workplan (Section 9.0) and DTSC Consent Order.
- C. Remove at least five feet of soil under each slab foundation per DTSC's Memorandum on the Review of the Closure and Post Closure Care Cost Estimate

for Permit Renewal and Bankruptcy Court Claim as required by 22 CCR 66264.112(b)(4).

- D. Collect samples with the backhoe bucket after the bucket has scraped a clean surface on the area to be sampled. Excavation sidewall samples should be collected every 40 linear feet at an approximate 2.5 ft mid-point of the 5 foot excavation depth. With regard to the number of excavation bottom samples, the following DTSC guidance based on square footage should be used:

< 500 ft² – 2 samples
500 < 1,000 ft² - 3 samples
1,000 < 1,500 ft² - 4 samples
1,500 < 2,500 ft² - 5 samples
2,500 < 4,000 ft² - 6 samples
4,000 < 6,000 ft² - 7 samples
6,000 < 8,500 ft² - 8 samples
8,500 < 10,890 ft² - 9 samples

- E. Soil sample jars should be labeled properly and placed in zip-closure plastic bags in a chilled ice chest for transport to the analytical laboratory under chain-of-custody procedures pursuant to Section 9.0 of the DTSC approved RFI Workplan.
- F. Backfill per DTSC’s “Information Advisory - Clean Import Fill Material” guidance, and cap the excavation areas immediately following sampling and prior to receipt of laboratory data.
- G. Dispose all excavated soil and demolished concrete foundation at a landfill licensed to handle the waste based on the results of sample characterization.

Since mitigation measure MMHAZ-01 is expected to fully remove any contaminated soils that may be found by excavating down to five feet in the disturbed area pursuant to DTSC’s Memo, the proposed project is expected to be less than significant to the public and environment for hazards and hazardous material.

The August 2014 revision of the Construction Activity Mitigation Plan has not yet been approved by the SCAQMD Hearing Board for inclusion into the Order for Abatement (Case No. 3151-32). SCAQMD staff has determined that the same conditions related to soil, handling, and storage procedures from demolition for the new RTO on the reverberatory furnace feed stack should be incorporated into the Final MND to ensure enforceability. Hence, mitigation measure MMHAZ-02 has been crafted to reflect the August 2014 Construction Activity Mitigation Plan requirements for the blast furnace charge hood’s new RTO soil, concrete handling, and storage procedures.

MMHAZ-02- Prior to the installation of the Blast Furnace RTO and cartridge filter baghouse, Exide shall:

- A. Transfer excavated concrete and soil into a rolloff container that is staged inside of the total enclosure building, for proper off-site disposal or recycling.

With mitigation measures MMHAZ-01 and MMHAZ-02, adverse hazards and hazardous material impacts, related to excavating the concrete and soil for the blast furnace charge hood new RTO, are expected to be less than significant because mitigation measure MMHAZ-02 uses the same construction emissions control (from the July 2014 Construction Activity Mitigation Plan) of the reverberatory furnace RTO.

SIGNIFICANT ADVERSE IMPACTS WHICH CANNOT BE REDUCED BELOW A SIGNIFICANT LEVEL

There are no potentially significant adverse environmental impacts that cannot be reduced to a level of insignificance for the proposed project.

MITIGATION MONITORING AND REPORTING PLAN

When a public agency adopts a mitigated negative declaration in conjunction with approving a project, the lead agency shall adopt a program for monitoring or reporting on the measures it has imposed to mitigate or avoid significant adverse environmental effects. PRC §21081.6 states in part:

When making the findings required by subdivision (a) of Section 21081 or when adopting a negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the public agency shall adopt a reporting or monitoring program for the changes to the project that it has adopted or made a condition of approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of an agency having jurisdiction by law over natural resources affected by this project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.

Pursuant to the requirement of PRC §21081.6, the SCAQMD must establish a plan to monitor project compliance with those mitigation measures adopted as conditions of approval for BP's Compliance and Safety Project. The following subsections identify the specific mitigation measures identified in the MND and the public agency responsible for monitoring implementation of each mitigation measure.

AIR QUALITY AND GREENHOUSE GASES

Mitigation Measures MMAQ-01 and MMAQ-02 are required to minimize the potential short-term significant adverse air quality impacts during project construction.

IMPACT SUMMARY: Construction and installation activities for the new RTO on the blast furnace charge hood may have significant unmitigated cumulative air quality impacts. Since the July 2014 Construction Activity Plan does not include the RTO on the blast furnace charge hood, the construction and installation requirements for this RTO are included in the Final MND as mitigation measures to ensure enforceability (the July 2014 Construction Activity Mitigation Plan is enforceable through the Hearing Board).

Hence, mitigation measures, MMAQ-01 and MMAQ-02, have been crafted to reflect the August 2014 Construction Activity Mitigation Plan requirements for the blast furnace charge hood's new RTO construction.

Each element of the Mitigation Measures MMAQ-01 and MMAQ-02 are listed in Table 1, along with its Monitoring Action, Responsible Party, Enforcement Agency, and Monitoring Agency.

HAZARDS AND HAZARDOUS MATERIALS

Mitigation Measures MMHAZ-01 and MMHAZ-02 are required to minimize the potential significant adverse hazards and hazardous materials impacts during project construction.

IMPACT SUMMARY: There is a potential of hazardous materials impacts that may be encountered by ground disturbance associated with construction of the proposed project. Any such impact could be considered significant. The mitigation measures listed in Table 1 would reduce impacts to hazards and hazardous materials to less-than-significant in the event that unexpected hazardous materials were encountered.

Each element of the Mitigation Measures MMHAZ-01 and MMHAZ-02 are listed in Table 1, along with its Monitoring Action, Responsible Party, Enforcement Agency, and Monitoring Agency.

CONCLUSION

In accordance with the monitoring action items outlined in Table 1 and a sample reporting form provided in Table 2 of this Mitigation Monitoring and Reporting Plan, Exide will be required to document compliance with the mitigation measures prior to the start of construction and during the construction phase of the proposed project. The SCAQMD and Exide will evaluate the effectiveness of this Mitigation Monitoring and Reporting Plan during the construction period.

Table 1 - Mitigation Monitoring and Reporting Plan for Exide Toxic Air Contaminants Reduction Project

Mitigation Measure	Implementation Requirement	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase
MMAQ-01 A.	Conduct activities within a building under negative pressure.	Exide	Maintain records to ensure the building maintains negative pressure (see sample form in Table 2).	1. SCAQMD 2. SCAQMD 3. Prior to the removal of the existing floor, underlying soil, and installation of the foundations for the new Blast Furnace RTO and cartridge filter baghouse
MMAQ-01 B.	Thoroughly clean the existing floor using HEPA vacuums followed by washing with potable water.	Exide	Maintain records to ensure the thorough cleaning (see sample form in Table 2).	1. SCAQMD 2. SCAQMD 3. Prior to the removal of the existing floor, underlying soil, and installation of the foundations for the new Blast Furnace RTO and cartridge filter baghouse
MMAQ-01 C.	Require the construction contractor to cut the concrete using wet methods to minimize generation of dust. The concrete being removed must be kept damp to minimize the generation of dust during the concrete demolition and removal activities.	Exide	Maintain records to ensure minimization of dust (see sample form in Table 2).	1. SCAQMD 2. SCAQMD 3. Prior to the removal of the existing floor, underlying soil, and installation of the foundations for the new Blast Furnace RTO and cartridge filter baghouse

Mitigation Measure	Implementation Requirement	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase
MMAQ-01 D.	Apply a fine water mist directly on the demolition hammer point during the demolition activities and excavation activities.	Exide	Maintain records to ensure a fine water mist is applied directly on the demolition hammer (see sample form in Table 2).	1. SCAQMD 2. SCAQMD 3. Prior to the removal of the existing floor, underlying soil, and installation of the foundations for the new Blast Furnace RTO and cartridge filter baghouse
MMAQ-01 E.	Capture and properly treat all water used for washing the floor and for other uses to prevent a secondary means of fugitive emissions into the air.	Exide	Maintain records to ensure proper treatment of used water (see sample form in Table 2).	1. SCAQMD 2. SCAQMD 3. Prior to the removal of the existing floor, underlying soil, and installation of the foundations for the new Blast Furnace RTO and cartridge filter baghouse
MMAQ-02 A.	Conduct activities within a building under negative pressure.	Exide	Maintain records to ensure the building maintains negative pressure (see sample form in Table 2).	1. SCAQMD 2. SCAQMD 3. Prior to the installation of the Blast Furnace RTO and cartridge filter Baghouse
MMAQ-02 B.	Wash all removed materials with potable water prior to placement into a container for proper offsite disposal or recycling.	Exide	Maintain records to ensure the materials are contaminant free (see sample form in Table 2).	1. SCAQMD 2. SCAQMD 3. Prior to the installation of the Blast Furnace RTO and cartridge filter Baghouse

Mitigation Measure	Implementation Requirement	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase
MMAQ-02 C.	Place the scrap into a rolloff container that is staged inside of the total enclosure building.	Exide	Maintain records to ensure scrap materials do not release fugitive contaminant emissions (see sample form in Table 2).	1. SCAQMD 2. SCAQMD 3. Prior to the installation of the Blast Furnace RTO and cartridge filter Baghouse
MMAQ-02 D.	Cover the roll off container when not in use.	Exide	Maintain records to ensure the container does not release fugitive dust emissions (see sample form in Table 2).	1. SCAQMD 2. SCAQMD 3. Prior to the installation of the Blast Furnace RTO and cartridge filter Baghouse
MMAQ-02 E.	Wash the exterior of the container with potable water and tarp the container prior to removal to outside of any enclosure buildings.	Exide	Maintain records to ensure the container does not release fugitive contaminant emissions (see sample form in Table 2).	1. SCAQMD 2. SCAQMD 3. Prior to the installation of the Blast Furnace RTO and cartridge filter Baghouse
MMHAZ-01 A.	Notify DTSC at least 72 hours prior to each excavation.	Exide	Provide written notification to DTSC	1. SCAQMD/DTSC 2. SCAQMD/DTSC 3. During the excavation phase of the proposed project

Mitigation Measure	Implementation Requirement	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase
MMHAZ-01 B.	Identify, sample, characterize, handle, segregate, store, and dispose of excavated soils pursuant to local, state, and federal regulations and per the DTSC approved RFI Workplan (Section 9.0) and DTSC Consent Order.	Exide	Maintain records to ensure the proper handling of the excavated soils (see sample form in Table 2).	1. SCAQMD/DTSC 2. SCAQMD/DTSC 3. During the excavation phase of the proposed project
MMHAZ-01 C.	Remove at least five feet of soil under each slab foundation per DTSC’s Memorandum on the Review of the Closure and Post Closure Care Cost Estimate for Permit Renewal and Bankruptcy Court Claim as required by 22 CCR 66264.112(b)(4).	Exide	Maintain records to ensure a sufficient depth was reached (see sample form in Table 2).	1. SCAQMD/DTSC 2. SCAQMD/DTSC 3. During the excavation phase of the proposed project

Mitigation Measure	Implementation Requirement	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase
MMHAZ-01 D.	<p>Collect samples with the backhoe bucket after the bucket has scraped a clean surface on the area to be sampled. Excavation sidewall samples should be collected every 40 linear feet at an approximate 2.5 ft mid-point of the 5 foot excavation depth. With regard to the number of excavation bottom samples, the following DTSC guidance based on square footage should be used:</p> <p>< 500 ft² – 2 samples 500 < 1,000 ft² - 3 samples 1,000 < 1,500 ft² - 4 samples 1,500 < 2,500 ft² - 5 samples 2,500 < 4,000 ft² - 6 samples 4,000 < 6,000 ft² - 7 samples 6,000 < 8,500 ft² - 8 samples 8,500 < 10,890 ft² - 9 samples</p>	Exide	Maintain records to ensure the proper samples were collected (see sample form in Table 2).	<ol style="list-style-type: none"> 1. SCAQMD/DTSC 2. SCAQMD/DTSC 3. During the excavation phase of the proposed project
MMHAZ-01 E.	Soil sample jars should be labeled properly and placed in zip-closure plastic bags in a chilled ice chest for transport to the analytical laboratory under chain-of-custody procedures pursuant to Section 9.0 of the DTSC approved RFI Workplan.	Exide	Maintain records to ensure proper soil protocols and chain of custody (see sample form in Table 2).	<ol style="list-style-type: none"> 1. SCAQMD/DTSC 2. SCAQMD/DTSC 3. During the excavation phase of the proposed project

Mitigation Measure	Implementation Requirement	Party Responsible for Implementing Mitigation	Monitoring Action	1. Enforcement Agency 2. Monitoring Agency 3. Monitoring Phase
MMHAZ-01 F.	Backfill per DTSC’s “Information Advisory - Clean Import Fill Material” guidance, and cap the excavation areas immediately following sampling and prior to receipt of laboratory data.	Exide	Maintain records to ensure the proper backfill and cap (see sample form in Table 2).	1. SCAQMD/DTSC 2. SCAQMD/DTSC 3. During the excavation phase of the proposed project
MMHAZ-01 G.	Dispose all excavated soil and demolished concrete foundation at a landfill licensed to handle the waste based on the results of sample characterization.	Exide	Maintain records to ensure proper disposal of the soil and concrete (see sample form in Table 2).	1. SCAQMD/DTSC 2. SCAQMD/DTSC 3. During the excavation phase of the proposed project
MMHAZ-02 A.	Transfer excavated concrete and soil into a rolloff container that is staged inside of the total enclosure building, for proper off-site disposal or recycling.	Exide	Maintain records to ensure the container does not release fugitive dust emissions (see sample form in Table 2).	1. SCAQMD 2. SCAQMD 3. Prior to the installation of the Blast Furnace RTO and cartridge filter baghouse

