



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

December 11, 2009

REPLY TO THE ATTENTION OF  
E-19J

Honorable Susan L. Biro  
Office of Administrative Law Judges  
U. S. Environmental Protection Agency  
Ariel Rios Building, Mailcode: 1900L  
1200 Pennsylvania Ave., NW  
Washington, D.C. 20460

RE: In The Matter of: Carley Foundry, Inc.  
Docket No.: EPCRA-05-2009-0031  
Amended Complaint Date: November 9, 2009  
Total Proposed Penalty: \$52,497.00

Dear Judge Biro:

Enclosed is a copy of the Respondent's Answer to an Administrative Complaint and Compliance Order for Carley Foundry, Incorporated in Blaine, Minnesota.

Please assign an Administrative Law Judge to conduct this case.

If you have questions contact me at (312) 886-3713.

Sincerely,

A handwritten signature in black ink, appearing to read "La Dawn Whitehead".

La Dawn Whitehead  
Regional Hearing Clerk

Enclosure

cc: Randy Oehrlein  
Vice President of Engineering  
Carley Foundry, Inc.  
8301 Coral Sea Street, NE  
Blaine, Minnesota 55449  
(763) 780-5123

Susan Tennenbaum, Esquire  
Associate Regional Counsel  
Office Regional Counsel  
U.S. EPA, Region 5  
77 West Jackson Blvd., C-14J  
Chicago, Illinois 60604-3590  
(312) 886-0273



# CARLEY FOUNDRY, INC.

8301 Coral Sea St. NE Blaine, Minnesota 55449

PREMIUM QUALITY CASTINGS • SAND • PERMANENT MOLD • INVESTMENT

(763) 780-5123 • Fax (763) 785-8883

<http://www.carleyfoundry.com>

- ISO 9001/2000 AS9100B Certified
- Aluminum & Steel Castings
- Greensand & Drysand Molding
- Conventional & Low Pressure Molding
- Investment Castings
- NADCAP Certified Heat Treat, NDT, Metallurgical Lab & Welding
- Full Service Pattern Shop with Prototype Capabilities

**Date:** December 10, 2009

SENT VIA OVERNIGHT COURIER SERVICE

U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago IL 60604-3590

RECEIVED  
DEC 11 2009  
REGIONAL HEARING CLERK  
U.S. ENVIRONMENTAL  
PROTECTION AGENCY,

**RE:** Answer to Amended Complaint. Docket EPCRA-05-2009-0031

**Attn:** Regional Hearing Clerk (E-19J)

Please review the attached original answer to the Amended Complaint noted above. Also enclosed is Attachment 1 as an additional response and supporting documents. . We look forward to the informal settlement conference as discussed with Ruth McNamara on December 9<sup>th</sup> but feel a copy of the fine worksheet as previously requested would help us prepare. We are curious if there is some reason under the FOIA that prevents us from obtaining a copy. One additional copy of all material is enclosed as well. A copy of the signed answer and one additional copy of all materials are being sent in a separate letter to Susan Tennenbaum (C-14J)

Sincerely,

Randy Gehrlein  
V.P. Engineering  
Carley Foundry, Inc.

RWO/rwo

cc: Mike Carley

Aerospace / Defense / Commercial

<http://www.carleyfoundry.com>

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

RECEIVED  
DEC 11 2009

REGIONAL HEARING CLERK  
U.S. ENVIRONMENTAL  
PROTECTION AGENCY

In the Matter of: ) Docket No. EPCRA-05-2009-0031  
)  
Carley Foundry, Inc. ) Proceeding to Assess a Civil Penalty  
8301 Coral Sea Street NE ) Under Section 325(c)(1) of the  
Blaine, Minnesota 55449 ) Emergency Planning and Community  
) Right-to-Know Act of 1986  
Respondent )

**ANSWER OF RESPONDENT  
CARLEY FOUNDRY INC.**

Defendant Carley Foundry, Inc. ("Carley"), for its Answer to the Amended Complaint of the Chief of the Emergency Response Branch 1, United States Environmental Protection Agency, Region 5 ("the Amended Complainant"), states and alleges as follows:

1. Carley admits the allegations in paragraphs 1 – 3 of the Amended Complaint.

2. In response to paragraphs 4 – 7, Carley states the statutory and regulatory provisions cited and summarized by the Complainant in those paragraphs speak for themselves and denies any obligation to respond further to the Complainant's reference to those provisions in the above paragraphs.

3. Carley admits the allegations in paragraphs 8 – 12 of the Amended Complaint.

4. In response to paragraphs 13 - 17, Carley states the statutory and regulatory provisions cited and summarized by the Complainant in those paragraphs speak for themselves and denies any obligation to respond further to the Complainant's reference to those provisions in the above paragraphs.

5. Carley admits the allegations in paragraphs 18 – 26 of the Amended Complaint.

6. In response to paragraph 27, Carley incorporates its responses to paragraphs 1 – 26 of the Amended Complaint.

7. Carley admits the allegations in paragraph 28 of the Amended Complaint.

8. In response to paragraph 29, Carley states 42 U.S.C. § 11022(a) speaks for itself and denies any obligation to respond further to the Complainant’s reference to that statutory provision in that paragraph.

9. In response to paragraph 30, Carley incorporates its responses to paragraphs 1 – 26 of the Amended Complaint.

10. Carley admits the allegations in paragraph 31 of the Amended Complaint.

11. In response to paragraph 32, Carley states 42 U.S.C. § 11022(a) speaks for itself and denies any obligation to respond further to the Complainant’s reference to that statutory provision in that paragraph.

12. In response to paragraph 33, Carley incorporates its responses to paragraphs 1 – 26 of the Amended Complaint.

13. Carley admits the allegations in paragraph 34 of the Amended Complaint.

14. In response to paragraph 35, Carley states 42 U.S.C. § 11022(a) speaks for itself and denies any obligation to respond further to the Complainant’s reference to that statutory provision in that paragraph.

15. In response to paragraph 36, Carley incorporates its responses to paragraphs 1 – 26 of the Amended Complaint.

16. Carley admits the allegations in paragraph 37 of the Amended Complaint.

17. In response to paragraph 38, Carley states 42 U.S.C. § 11022(a) speaks for itself and denies any obligation to respond further to the Complainant's reference to that statutory provision in that paragraph.

18. In response to paragraph 39, Carley states the statutory provisions cited and summarized by the Complainant in that paragraph speak for themselves and denies any obligation to respond further to the Complainant's reference to those provisions in the above paragraph.

19. In response to the allegations in paragraph 40 of the Amended Complaint, Carley admits the Complainant has proposed a civil penalty of \$50,063 against Carley for the EPCRA violations alleged in the Amended Complaint, but additionally states that it is without sufficient knowledge as to how the Complainant applied the factors listed in that paragraph to calculate the proposed penalty because Carley has not yet seen the Complainant's Penalty Calculation Worksheet; and denies the proposed penalty is appropriate under the factual circumstance for the reasons set forth in Attachment 1 to this Answer, which attachment is hereby incorporated by reference into this Answer.

### REQUEST FOR HEARING

Carley requests a hearing on this matter pursuant to 40 C.F.R. § 22.15(c).

RECEIVED  
DEC 11 2009

REGIONAL HEARING CLERK  
U.S. ENVIRONMENTAL  
PROTECTION AGENCY



Randy Oehrlein  
Vice President of Engineering  
Carley Foundry, Inc.  
8301 Coral Sea St. NE  
Blaine, MN 55449

**ATTACHMENT 1 TO CARLEY FOUNDRY, INC'S ANSWER**  
***In the Matter of Carley Foundry Inc.***  
**Docket No. EPCRA-05-2009-0031**

**Additional Response to Amended Complaint Paragraph 40**

Carley Foundry, Inc. ("Carley") supplements its response under paragraph 19 of its Answer as follows:

Carley does not contest the penalty amounts associated with Counts 1 and 2 in paragraph 40 of the Amended Complaint. Carley believes the proposed penalty amounts for Counts 3 and 4, however, are excessive, in light of the circumstances, and should be adjusted further downward using adjustment factors included in the *Enforcement Response Policy for Sections 304, 311 and 312 of the Emergency Planning and Community Right-to-Know Act and Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act* ("Response Policy") as follows:

**Count 3: EPCRA Section 312(a) (SERC)**

At the time Carley's Emergency and Hazardous Chemical Inventory ("EHCI") Form for calendar year 2008 was due to the State Emergency Response Commission ("SERC") (in this case, the Minnesota Division of Homeland Security and Emergency Management ("MDHSEM")), Carley was subject to an ongoing EPA investigation for potential violations of EPCRA sections 312 and 313 for calendar years 2006, 2007 and 2008. Carley was aware of the submission deadline, but, because it had never faced allegations of EPCRA section 312 violations before, it was concerned that about the possibility of submitting incorrect information in the 2006 – 2008 Forms that would exacerbate the allegations for which it was already being investigated. For these reasons, Randy Oehrlein, Vice President of Engineering for Carley, on February 27, 2009 contacted EPA staff member John Myhre, who had been investigating Carley's alleged EPCRA violations, for guidance on whether Carley should submit the 2006 – 2008 Forms before completion of the EPA's investigation. Mr. Myhre suggested Mr. Oehrlein contact Steve Tomlyanovich for guidance on that question. Mr. Tomlyanovich is the State Program Administrator for the Minnesota EPCRA Program, the division of the MDHSEM with responsibility for EPCRA compliance in this state, including receipt of EHCI Forms. Mr. Tomlyanovich suggested Carley wait until the EPA's violation investigation was complete before Carley submitted its 2006 and 2007 EHCI Forms and its upcoming 2008 EHCI Form. See telephone notes dated February 27, 2009 created by Mr. Oehrlein, attached. Carley had until recently relied on that advice until it became aware that Mr. Tomlyanovich did not possess the authority to amend, waive or alter the regulatory deadlines for submission of the EHCI Forms. Carley is now in process of filing its 2006-2008 Forms with Mr. Tomlyanovich's division for review and processing.

Carley now understands that Mr. Tomlyanovich did not possess the authority to advise Carley on when to submit the latter's EHCI Forms to his agency. Carley

nevertheless believes equity requires EPA adjust this penalty downward by 10% under section VIII.E of the Response Policy. Carley had no previous history of EPCRA violation allegations and therefore looked in good faith to the lead SERC administrator on this topic for guidance and assistance. Carley followed his advice, again in good faith and under the sincere belief that it was appropriate to do so. That that reliance later turned out to be mistaken does not alter the sincerity and good faith with which Carley acted. In short, Carley believes it inequitable to assert a penalty of \$27,749 against Carley for its failure to submit a form to a SERC whose administrator with responsibility over this area advised Carley to wait until after the completion of the EPA's investigation to do so. Carley therefore believes justice and equity require a 10% reduction under section VIII.E. to **\$24,974.10**, under these circumstances.

Count 4: EPCRA Section 312(a) (fire department)

Carley does not deny that it failed to submit a completed 2008 EHCI Form that included sulfuric acid and propane to the Blaine Fire Department by March 1, 2009. As the attached documents show, however, the Blaine Fire Department has been aware of the existence of the propane tank at Carley's facility since at least 2003. For instance, the Department's Pre-Fire Incident Plan (attached) includes a map of Carley's facility created by the Department and dated September 24, 2004. The map clearly shows the existence of the propane tank in question. Furthermore, correspondence from the Department to Carley also shows the Department's awareness that the tank contained hazardous and flammable material. *See, e.g.*, Letter from Douglas Nelson, Blaine Fire Department, to Todd Glenndenning, President of Carley, dated June 28, 2004, regarding inspection of November 20, 2003 (instructing Carley to "Label both ends of propane tank with UN/704 placards and label fence enclosure with *flammable gas/propane signage*) (emphasis added).

Carley believes a downward adjustment to the proposed \$18,314 penalty for this violation is also appropriate under section VIII.E of the Response Policy. As the EPA notes in section V.D. of the Response Policy, "One objective of the emergency notification provisions is *to alert* federal, state and *local officials* that a response action may be necessary to prevent injuries or deaths to emergency responders, facility personnel, and the local community." (emphases added). In this case, although Carley did not submit its completed EHCI Form to the Blaine Fire Department for calendar year 2008 that included a notification of the presence of propane at Carley's facility, the Department had been aware of that fact since at least November 2003 because of Carley's disclosure of that fact during the Department's inspections of Carley's facility. Thus, although Carley failed to satisfy EPCRA's particular disclosure requirements, Carley did make the Department aware of the presence of this hazardous chemical at its facility, in keeping with EPCRA's purpose. Carley therefore believes a 10% downward adjustment to **\$ 16,482.60** is appropriate, under these circumstances.

### All Counts

Finally, section VIII.G. of the Response Policy allows an additional 25% reduction to the penalty based on the respondent's cooperation throughout the compliance evaluation/enforcement process. Carley has done its best to be as responsive and assistive to EPA as it could as EPA undertook its investigation of the alleged EPCRA violations. For example, Carley provided full and timely responses to EPA's October 15, 2008 Request for Information, as requested. Carley also has never hesitated to allow EPA to investigate its facilities as part of its ongoing investigation. Finally, simultaneous with the filing of this Answer, Carley is contacting EPA to request the parties begin informal settlement discussions in the hopes they can resolve this matter without the need for a formal hearing. Carley believes its cooperation to date and its willingness to explore an early resolution to this matter exemplify the cooperative attitude that this adjustment factor intends be taken into consideration in the final penalty amount.



2/27/09

**Carpenter Brothers, Inc.**  
Industrial Supplies and Equipment

Milwaukee (414) 354-6555  
Muskegon (231) 798-8819  
Minneapolis (612) 788-3313

2/27/09 4:00 PM

I also called Steve  
Townsend at  
the State of Minnesota  
to advise him of  
the status, since he  
would see no report  
from us yet. He advised  
to sit tight until I hear  
back.

Randy DeLub

www.carpenterbrothersinc.com

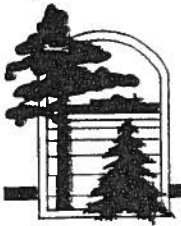
**Carpenter Brothers, Inc.**  
Industrial Supplies and Equipment

Milwaukee (414) 354-6555  
Muskegon (231) 798-8819  
Minneapolis (612) 788-3313

I called John Myr.  
at the EPA on 2/27/09,  
3:45 PM to see if  
there were any findings  
from our test 313

Audit. in fall of 2008  
He said they are working  
on it and have gotten  
behind so it is not  
done yet. Concern  
over upcoming Form R

www.carpenterbrothersinc.com



# City of Blaine

10801 Town Square Drive NE  
Blaine, MN 55449-8101  
www.ci.blaine.mn.us

May 8, 2007

Todd Glendenning – President  
Carley Foundry  
8301 Coral Sea Street  
Blaine, MN. 55449

Subject: Fire Inspection conducted 05/04/2007

Dear Todd:

I would like to thank you for your cooperation in arranging this inspection. As we discussed, fire inspections are conducted to ensure the long-term viability of your facility as well as to protect the safety of your employees, clients and the firefighters who volunteer to protect this structure. You are a valued member of our business community. Our goal is to ensure the safety of your facility through education and a cooperative effort to achieve voluntary compliance. We understand that some of these issues may involve modifications that may require additional time. If at any point you need additional time or assistance please don't hesitate to call.

Please take the following corrective actions to achieve compliance with the minimum requirements of the State Fire and Building Codes.

- Label the exterior side of all man doors on your building with 8-inch tall address numerals. The numbers shall contrast with their background. The numbering should start at the main office entrance (#1) and proceed clockwise around the building. (MSFC Sec. 505.1)
- Provide documentation of annual sprinkler system testing and inspection by a state licensed sprinkler contractor. (MSFC Sec. 901.6.1)
- Provide MSDS Sheets for new chemicals to be used in your dry sand area.
- Replace missing sprinkler head escutcheon plates in the maintenance room: (NFPA 13 A-3-2.7.2)
- A means of egress shall be free from obstructions that would prevent its use, including the accumulation of snow and ice. (MSFC Sec. 1011.3)
- Remove obstructions from fire doors and maintain for proper operation. (MSFC SA Sec. 703.2)

Compliance on each of these items should begin immediately. A follow-up inspection will be conducted within thirty (30) days on all items unless otherwise noted. A low interest loan program is available for fire safety improvements if you need additional assistance. If you wish to request additional time or appeal any of the above listed requirements please do so in writing within ten (10) working days of receiving this notice.

As indicated, the purpose of this inspection is to ensure a safe facility for the employees, visitors, and the firefighters who protect your property. If you have any questions or if you require any additional information or assistance please feel free to contact me at: (763) 717-2644.

Sincerely,



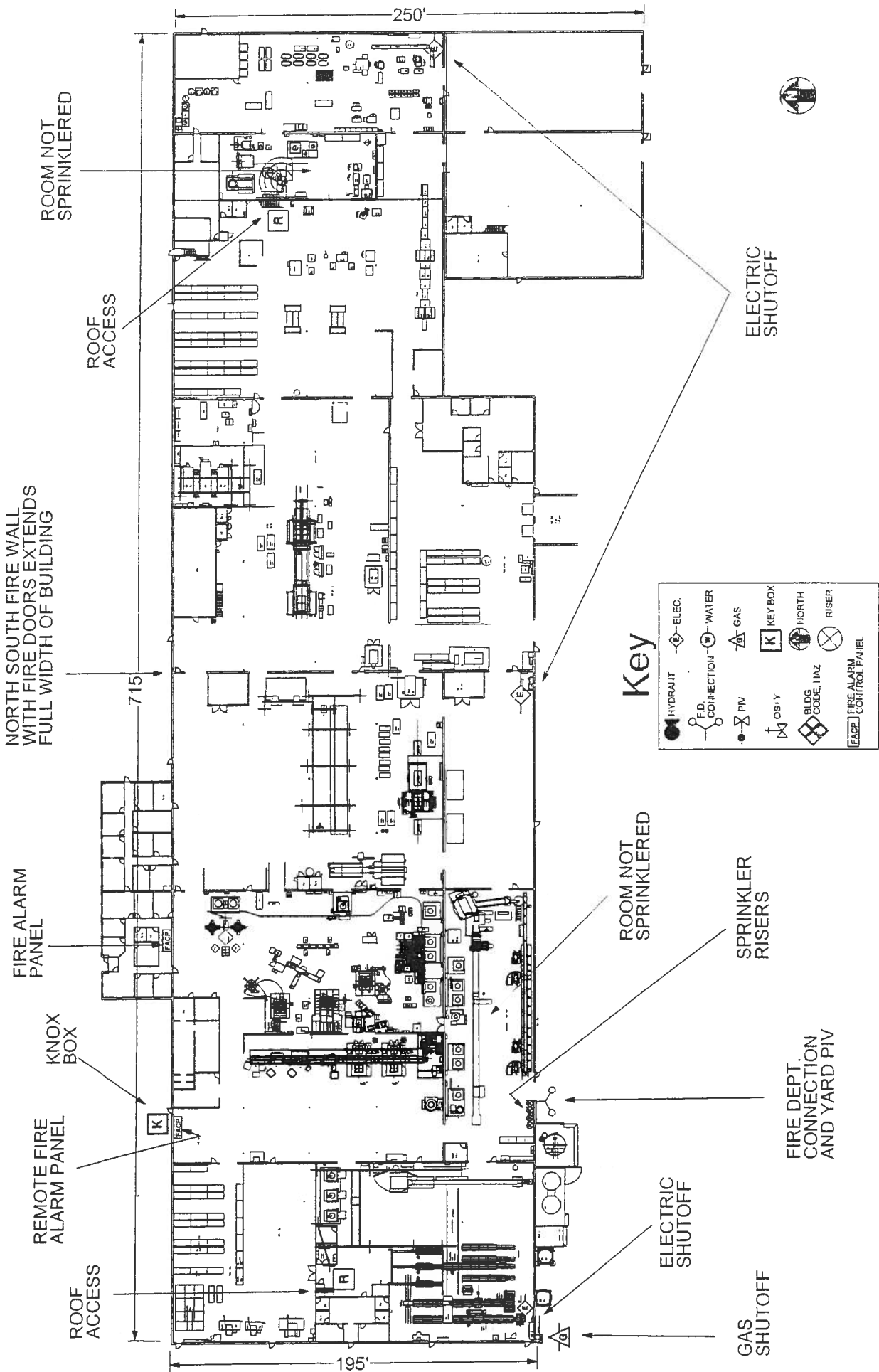
Douglas Nelson  
Fire Inspector / Firefighter  
City of Blaine

DN

*H:\Community Development\Fireinsp\DN\2007 Inspections\Carley Foundry - 8301 Coral Sea.doc*

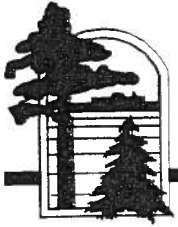
<b>Date:</b> 9/23/04		<b>SBM Fire Department Pre-Fire Incident Plan</b>		<b>Grid:</b> M-4	
<b>Name</b>			<b>Address</b>		
<b>Carley Foundry</b>			<b>8301 Coral Sea Street</b>		
<b>Description of Use</b>			<b>Keybox, Keyholder, and Business Info</b>		
*Aluminum Casting Foundry			* <u>Keybox</u> : North Elevation (West End) * <u>Phone</u> : (763) 780-5123 * <u>Hours</u> : 04:00 - 01:00 Sun. - Sat. * <u>Keys</u> : Mike Carley (651) 490-0694 Todd Glendenning (651) 484-7505 Randy Oeherlein (651) 644-4827 Bryan Cress (7152) 265-4616 * <u>Manager</u> : Todd Glendenning		
<b>Construction</b>			<b>Fire Sprinklers</b>		
* <u>Exterior Walls</u> : Concrete Block * <u>Interior Walls</u> : Sheetrock w/ Metal Studs * <u>Fire Walls</u> : * <u>Roof Type</u> : Metal Deck / Steel Truss * <u>Height</u> : 24 Feet * <u>Roof Access</u> : (2) West and East end -see plan			* <u>Coverage</u> : Majority of Bldg. (see notes ) * <u>FDC</u> : South Elevation near Sand tanks * <u>Standpipes</u> : N/A * <u>Riser</u> : Access via man door near FDC * <u>PIV</u> : YPIV - South Side of Building		
<b>Square Footage</b>			<b>Alarm Systems</b>		
480 sq. ft. offices 144,000 sq. ft. manufacturing & storage 148,800 sq ft. Total			* <u>Type</u> : Smoke / Waterflow * <u>Control Panel</u> : Office - Rear Hallway * <u>Remote Annunciator</u> : inside door near knock * <u>Monitoring</u> : Armor Security (612) 870-4142		
<b>Utility Disconnects</b>			<b>Water and Hydrants</b>		
* <u>Gas</u> : South Elevation (West Corner of Bldg)  * <u>Electric</u> : (3) separate disconnects - see plan  * <u>Domestic Water</u> : NW interior of Pattern Shop			* <u>Street Hydrants</u> : (2) on West side of Coral Sea  * <u>On-site Hydrant</u> : (2) north and south side  * <u>Problems</u> :N/A		
<b>Special Hazards and Features</b>					
*1.) *** Molten Aluminum Furnaces - DO NOT SPRAY WATER NEAR FURNACES. See Attached Plan for these Hazard Areas.****  2.) Multiple Unsprinklered areas of the building - See Floor Plan  3.) IBC's containing Flammable Liquids and some Toxics - See Plan  4.)					
*Additional Pages With Hazmat Info: No					D.Nelson





# Carley Foundry - 8301 Coral Sea Street

Drawn By: Matti  
09/24/04



# City of Blaine

10801 Town Square Drive NE  
Blaine, MN 55449-8101  
www.ci.blaine.mn.us

June 28, 2004

Todd Glendenning – President  
Carley Foundry  
8301 Coral Sea Street  
Blaine, MN. 55449

Subject: Fire Inspection conducted 11/20/2003

Dear Todd:

I would like to thank you for your cooperation in arranging this inspection. As we discussed, fire inspections are conducted to ensure the long-term viability of your facility as well as to protect the safety of your employees, clients and the firefighters who volunteer to protect this structure. You are a valued member of our business community. Our goal is to ensure the safety of your facility through education and a cooperative effort to achieve voluntary compliance. We understand that some of these issues may involve modifications that may require additional time. If at any point you need additional time or assistance please don't hesitate to call.

Please take the following corrective actions to achieve compliance with the minimum requirements of the State Fire and Building Codes.

## Exterior:

- Done* • Cross out hazmat labels and cap all drums that are stored outside.
- Done* • Label both ends of propane tank with UN/704 placards and label fence enclosure with flammable gas/propane signage.
- FDC* • Replace missing Fire Department Connection (FDC) caps and flush rocks out of FDC.

## Roof:

- No issues.

## Area 1a:

- Done* • Install emergency lamps and illuminated exit signs above exit doors in pattern shop.
- Replace painted sprinkler head beneath north~~east~~<sup>west</sup> overhead garage door.

**Area 1b:**

- Done • Replace key locking hardware on old office area exit door with single action type hardware.
- Done • Keep combustibles a minimum of 3 feet away from old office area water heater.
- open — • Flammable liquid dispensing by gravity from containers is allowed provided that the containers have either approved self-closing or automatic closing valves and that the containers are provided with approved secondary containment in accordance with section 3403.4 of the Minnesota State Fire Code.
- Done • Install emergency lights throughout area.
- Done • Label all circuit breakers in electrical panels.
- Done • Designate two remote exits from this area and mark exits with illuminated exit signs and emergency egress illumination (emergency lights). Over head garage doors cannot be used for exiting.
- Done • Replace missing escutcheon plate on sprinkler head in paint room.
- Done • Class II Combustible Liquids (Techniset) storage/closed use exceeds maximum allowable amount. 275 gallons total reported / 240 gallons maximum allowed. Reduce Quantities. (MSFC Sec 2703.1.1(1))

**Area 2a:**

- Done • Designate a second remote exit from this area and mark exit with an illuminated exit sign and emergency egress illumination (emergency lights). Over head garage doors cannot be used for exiting.
- Done • Label all circuit breakers in electrical panels.
- Done • Flammable totes x 2 in closed use system.
- Done • Install portable fire extinguishers near exits and maintain a maximum 75-foot travel distance between extinguishers.
- Y2 Done • Class IIIA Combustible Liquids (Sigma Cure 7221 combined with Sigma Cure 7601) show a reported amount of 800 gallons. The Maximum allowable amount of a Class IIIA Comb. Liquid within a control area is 660 gallons (with fully sprinkled building). Additionally the Sigma Cure 7601 is classified as a Highly Toxic Substance and as a result has a very reduced allowable amount within a control area (2 gallons maximum allowed per control area in your building). The Sigma Cure 7601 amounts will need to be reduced, product changed to a non-highly toxic substance or additional requirements will apply.

check 2/8/05

**Area 2b:**

- at Duke  
checked  
WMO Done Done • ~~Install fire sprinklers in unsprinklered south room.~~
- Done • Install portable fire extinguishers with a maximum 75-foot travel distance.
- Done • Lock sprinkler control valves in the open position with either chains or heavy duty zip ties.

**Area 2c:**

- Done • Relocate combustible rack storage to a sprinklered area of the building.



- Done*
- Designate 2 remote exits from this area and mark exit with an illuminated exit sign and emergency egress illumination (emergency lights). Over head garage doors are not to be considered an exit.

Area 2d: *Done*

- Done*
- Install a sprinkler head beneath overhead garage door.
  - Install escutcheon plates on sprinkler heads where missing. *11-11*
- Done*

*Maintainance  
Sprinkler*

Area 3a:

- None  
Flammable*
- The walk-in ovens would be required to be sprinkler protected if there are flammable vapors present in the oven during their use.
  - ~~Repair damaged over-head fire door track. The doors closing in the event of a fire may be compromised.~~
  - Designate a second remote exit from this area and mark exit with an illuminated exit sign and emergency egress illumination (emergency lights). Over head garage doors are not to be considered an exit.
- Maintainance  
Done*
- Done  
New Builds*

Area 3b:

- Flammable  
Call missed  
Done*
- The walk-in ovens would be required to be sprinkler protected if there are flammable vapors present in the oven during their use.
  - ~~Install sprinkler heads in unsprinklered compressor room.~~ *missed again*
  - Install portable fire extinguishers with a maximum 75-foot travel distance.

Area Separation Wall between Areas 3 and 4:

- Done*
- Seal all penetrations in fire-wall with a listed fire caulking material.
  - Fusible link on OHD
  - Problem with south OH fire door?
- Done*

Area 4a:

- missed  
open  
with in  
lines  
Done*
- ~~Men's and women's restrooms need sprinkler heads lowered and escutcheon plates.~~ *Done*
  - Aluminum dust problems?
  - Designate a second remote exit from this area and mark exit with an illuminated exit sign and emergency egress illumination (emergency lights). Over head garage doors are not to be considered an exit.
- 11-11*

Area 4b:

- Done*
- Install sprinkler heads in non-sprinklered office next to the X-ray room.

Area 4c:

- None.

Area 4d:

- Done* →
- Office area vestibule requires a sprinkler head.

Area 5a:

- None.

Area 5b:

- Done* →
- Upgrade fusible links on fire doors to a higher temperature link to prevent false trips on fire doors.
- Done* →
- Add emergency lighting above exit doors.

Area 5c:

- Done* →
- Office vestibule needs a sprinkler head.

Area 5d:

- needed missed* →
- Office vestibule needs a sprinkler head. *Done*

Area 5e:

- None

*I added Brad's office with 5 sprinkler. Done*

Area 6:

- Done Done* →
- Office vestibule needs a sprinkler head.
  - One office with improper sprinkler head spacing (9' off two walls).

General Comments:

- ← • Label all natural gas lines every 20 feet. Labeling shall include name of product "natural gas" and shall have a direction of flow arrow.
- ← • Spill absorbents for hazardous materials provided?
- ← • Provide Class D extinguishers if water reactive metals are processed within facility.
- ← • Aluminum dust problem?
- ← • Provide documentation of annual testing of all roll-down fire doors. Maintain records of such testing on site for review by fire inspector. Testing of fire doors shall be in accordance with the manufacturers instructions by qualified individuals.

Compliance on each of these items should begin immediately. A follow-up inspection will be conducted within sixty (60) days on all items unless otherwise noted. A low interest loan program is available for fire safety improvements if you need additional assistance. If you wish to request additional time or appeal any of the above listed requirements please do so in writing within ten (10) working days of receiving this notice.

As indicated, the purpose of this inspection is to ensure a safe facility for the employees, visitors, and the firefighters who protect your property. If you have any questions or if you require any additional information or assistance please feel free to contact me at: (763) 717-2644.

Sincerely,



Douglas Nelson  
Fire Inspector

DN

*I:\Fireinsp\Dju\2004 Inspections\Carley Foundry - 8301 Coral Sea.doc*