

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B190931080

FACILITY: CWC Textron		SRN / ID: B1909
LOCATION: 1085 W. Sherman Blvd, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: Robert Meacham, Manager of Engineering		ACTIVITY DATE: 09/10/2015
STAFF: Eric Grinstern	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced inspection		
RESOLVED COMPLAINTS:		

Inspection 2015**FACILITY DESCRIPTION**

CWC Textron is located in the City of Roosevelt Park in Muskegon County. The facility is an iron foundry. The major production operations are raw material handling, mold production, metal melting, pouring and cooling, and casting finishing.

Iron is melted in a cupola and held in two electric induction furnaces. The facility utilizes a green sand molding system and does not utilize cores. Currently a majority of iron produced is inoculated to produce ductile iron. The facility has numerous finishing operations.

REGULATORY OVERVIEW

The facility is a major source of criteria pollutants and operates under ROP No. MI-ROP-B1909-20013, which was issued on June 24, 2013. The facility is a minor source of HAPs and is subject to the area source foundry NESHAP, Subpart ZZZZZ. The facility is considered a "large" area source under Subpart ZZZZZ. The facility was issued PTI No. 139-14, which addresses the installation and operation of an auto pour line. The facility has installed a majority of the line, but has not operated the line. The facility will be submitted a minor modification request to roll PTI No. 139-14 into the ROP.

COMPLIANCE EVALUATION

At the facility staff consisting of Eric Grinstern met with Robert Meacham, Manager of Engineering.

SOURCE-WIDE CONDITIONS**Emission/Material Limits**

The facility has source-wide limits to restrict emissions to less than the major source thresholds for HAPs. The facility is restricted to melting less than 150,000 tons per year of iron in the existing ROP, but took a restriction of 99,000 tpy limit in PTI No. 139-14. They are required to maintain melt records as well as maintaining monthly and 12-month individual and aggregate HAP emission records.

The facility provided records of metal melted as well as HAP emissions. The records showed that they are below the permitted limits.

Status: Compliant

EU-BULK-BOND

Storage silo and day storage bin which store bulk bond and have a pneumatic transport system. The silo and bin are each controlled by separate bin vent collectors.

Emission/Material Limits/Monitoring

The emission unit has an emission limit for particulate emissions. To assure compliance with the particulate limit the facility is required to use bin vent collectors, maintain a PM plan and perform VE observations on a weekly basis.

Review of records showed no abnormal observations.

Status: Compliant

Note: No emissions or other issues were noted during the inspection.

EU-DUCTILE-IRON

Equipment used for preparation of ductile iron which includes magnesium treatment vessels, a desulfurization ladle with fluorspar addition and an Ajax holding furnace. The furnace is also used for gray iron. The ductile process is controlled by Dust Collector #5.

Emission/Material Limits/Monitoring

The emission unit contains limits for particulate matter, opacity and fluorides.

Compliance with the emissions limits is demonstrated through a limitation on the amount of fluorspar used (54 pounds per hour – daily ave.) and the amount of ductile iron produced (24 tons/hr produced based on an 8 hour ave.). The facility is also required to maintain the baghouse with a particulate sensor and pressure drop gauge as well as perform weekly VE readings.

The facility provided records showing that they check the fluorspar feed rate quarterly which showed compliance with the hourly usage limit. Records of ductile iron production showed the facility to be in compliance with the limit of 24 tons per hour on an 8 hour average.

The facility provided the required monitoring records.

Status: Compliant

EU-NEW-SAND

A bin which stores new sand having a pneumatic transport system. The bin is controlled by a bin vent filter.

Emission/Material Limits/Monitoring

The emission unit limits the emission of particulate matter.

Compliance with the particulate limit is based upon operation of the bin vents and following the PM plan. The facility is also required to perform weekly VE observations.

The facility provided records of VE observations demonstrating compliance. Review of the past 12-months of records showed no issues.

Status: Compliant

Note: No emissions were noted during the inspection.

EU-WEST-CUPOLA-1

Emissions from the cupola are controlled by two direct flame afterburners, wet cap, a high energy venturi scrubber and a high velocity mist eliminator. Emission unit includes charging operations. The emission unit is subject to CAM for particulate emissions.

Emission/Material Limits/Monitoring

The emission unit limits the emission of particulate matter. Compliance with the particulate limit is assumed through proper operation of the venturi and demister. Additionally, the facility is required to perform stack testing between 6 and 18 months prior to the expiration of the ROP for particulate as well as SOX, NOX, and CO. The facility is required to maintain records of daily VE readings, charge records and hours of operation. The facility also must maintain

water pressure rate records for the scrubber as well as pressure drop records for the scrubber and demister.

The facility provided the required records.

Status: Compliant

Note: Cupola not operating at the time of the inspection due to process failure associated with shakeout that occurred earlier in the day.

EU-MP-RBB

Knockoff operation #227, Spiral Elevator #228 and Rocker Barrel Blast (finish blast) Emission unit is subject to CAM for particulate emissions. Emissions are controlled by Dust collectors #1 and #13.

Emission/Material Limits/Monitoring

The emission unit has limitations for the emission of particulate matter and opacity. Compliance with the particulate and opacity limits is assumed through operation of the baghouses, implementing a PM Plan, and performing daily VE observations. The facility is required to maintain records of the baghouse pressure drop readings as well as the particle sensor readings.

The facility provided the required records.

Status: Compliant

EU-ACS-SAND

The ACS sand system includes the sand cooler #16, the sand muller, the sand distribution tower sand elevators #18 and #23 and the sand basement. Emission unit is subject to CAM for particulate emissions. All of the processes are controlled by Dust Collector #19.

Emission/Material Limits/Monitoring

The emission unit has limitations for the emission of particulate matter. Compliance with the particulate emission unit is assumed through proper operation of the dust collector and operating according to a PM Plan. The facility is required to monitor and maintain records of daily VE observations and monitor and record the pressure drop across the collector once per day.

The facility provided the required records.

Status: Compliant

FG-PARTICULATE

Various particulate sources: EU-SHAKEOUT is subject to CAM for particulate emissions.

Emission Units: EU-CLEAN, EU-FINISHING, EU-SHAKEOUT, EU-AJAX-FURN, EU-POURING, EU-COOLING

POLLUTION CONTROL EQUIPMENT

EU-CLEAN: 50,000 CFM DC#1, DC #5

EU-FINISHING: 15,000 CFM DC#2

EU-SHAKEOUT: 60,000 CFM DC#17, 50,000 CFM DC#6

Emission/Material Limits/Monitoring

The flex group limits the emission of particulate matter.

Compliance with the particulate limit is assumed through proper operation of the pollution control equipment and

operating according to a PM Plan. The facility is required to monitor and maintain records of the following: daily VE observations and daily pressure drop across the fabric filters.

The facility provided the required records.

Status: Compliant

Iron and Steel Foundry NESHAP, Subpart ZZZZZ

The facility is subject to Subpart 5Z. The facility has submitted the required notifications under the NESHAP. The facility tested and demonstrated compliance with the emission limits in Subpart 5Z. The facility submits semi-annual certification reports in accordance with subpart 5Z.

Status: Compliant

Conclusion

Based on the information and observations obtained during this inspection, the facility appears to be in compliance with applicable air quality rules and regulations.

NAME 

DATE 9/21/2015

SUPERVISOR 