



339 West Hovey Avenue
Muskegon Heights, MI 49444

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August 8, 2023



Mr. Eric Grinstern
EGLE, AQD, Grand Rapids District
350 Ottawa Avenue NW, Unit 10
Grand Rapids, Michigan 49503

Re: Century Foundry, Inc. Plant 1 and Plant 3 SRN N7027, July 21, 2023 Violation Notice

Dear Mr. Grinstern:

The following letter is in response to the July 21, 2023 Violation Notice detailing the results of the compliance inspection conducted on May 11, 2023 at Century Foundry, Inc. – Plant 1 located at 339 West Hovey Avenue and Plant 3 located at 2416 Park Street, Muskegon Heights, Michigan. The air emissions at Plants 1 and 3 are regulated by Permit To Install 43-05C, issued July 26, 2019.

The following violations were noted in the Violation Notice:

Process Description

FGPT1REVERB1
Aluminum Melting Furnace

Rule/Permit Condition Violated

PTI No. 43-05C, FGPT1REVERB1, Special Conditions I.1.,2. & 3.

Comments

Exceedances of the permit allowable PM, PM10 and PM2.5 emission rates.

Dates of Violations

8-9-22 PM10 = .1872 pph, PM2.5 = .1555 pph
11-23-22 PM10 = .1508 pph
12-27-22 PM10 = .1508 pph

Causes and Duration of Violations:

The allowable permit particulate emission rates in accordance with Permit To Install 43-05C are PM 0.15 pph, PM10 0.15 pph and PM2.5 .15 pph. Prior to the May 11, 2023 inspection the emission rates were calculated using an average of 24 hours per day on a monthly basis. 24 hours per day was used because the crucible furnaces are on 24 hours per day. After the inspection, the facility was notified by the EGLE that the hourly emissions should have been

calculated over an 8-hour shift using a daily average. A 10-hour shift was used in instances where additional metal was melted.

The calculations were modified using the new parameters. Also, existing controls that were not used for the original calculations were applied to provide a more realistic representation of the emissions in accordance with permit 43-50C. A copy of the PM, PM10 and PM2.5 Hourly Emission Tables for FGPT1REVERB1 have been e-mailed to the EGLE for reference.

Ongoing Violations:

According to the new calculations, the last particulate emission violation occurred on February 7th, 2023 where PM10 was .1508 pph. Currently the hourly PM, PM10 and PM2.5 particulate emissions from FGPT1REVERB1 do not exceed the allowable limit.

Summary of Actions Taken:

PM, PM10 and PM2.5 particulate emissions from FGPTREVERB1 will be maintained below the allowable limit by reducing the tons of metal melted per day until long term emission controls can be implemented.

Proposed Corrective Actions:

The facility is currently reviewing the possibility of shutting down FGPTREVERB1 and transferring the 2 crucible furnaces from Plant 3 that is currently nonoperational due to a major fire. In addition, a particulate collection hood will be constructed over the existing 6 crucible furnaces and the 2 furnaces transferred over from Plant 3. The baghouse dust collector from Plant 3 will be transferred to Plant 1 where it will be used to collect the particulates generated by the 8 crucible furnaces. It is assumed the crucible furnaces and baghouse dust collector from Plant 3 can be transferred to Plant 1 without the need to modify the permit in accordance with exemption Rule 285(2)(c)(iii)

Dates Corrective Actions will take place:

The proposed corrective actions discussed above will be instituted as soon as the Reverb Furnace is removed from Plant 1 and the furnaces and baghouse dust control can be transferred from Plant 3 and attached to the new emission collection hood to be constructed.

Reoccurrence Prevention: Procedures will be implemented that will control the amount of metal melted per day below a level that will ensure the PM, PM10 and PM2.5 particulate emission rates are maintained below the allowable limits.

Process Description

FGCLEANING

Casting Cleaning Operations

Rule/Permit Condition Violated

PTI No. 43-05C, FGCLEANING Special Conditions VI.1

Comments

Failure to maintain the EUSHOTBLAST baghouse with a pressure drop gauge.

Dates of Violations:

The violations continued until the date the pressure drop gauges were installed.

Causes and Duration of Violations:

The baghouse dust collector was existing at the time the current permit was approved and did not have a pressure drop gauge installed.

Ongoing Violations:

There is no ongoing violation because a pressure drop gauge has been installed and is operating correctly.

Summary of Actions Taken:

Century personnel will ensure the baghouse dust collector is installed, maintained, and operated in a satisfactory manner. A pressure drop gauge has been installed on the EUSHOTBLAST. Century personnel will monitor and record in a satisfactory manner, the baghouse pressure drop for the EUSHOTBLAST on a once per operating shift basis.

Proposed Corrective Actions:

There are no proposed corrective actions.

Dates Corrective Action Will Take Place:

A new pressure drop gauge has been installed in the EUSHOTBLAST baghouse. A technical description of the pressure gauge and a brief description of the dust collector is attached for reference.

Reoccurrence Prevention:

Century personnel will ensure this violation does not occur again by maintaining the pressure gauges in accordance with the manufacturer's recommendations.

Process Description

Casting Cleaning Operations

Rule/Permit Condition Violated

PTI No. 43-05C, FGCLEANING Special Conditions IV.1

Comments

Operation of EUGRINDING without the required baghouse control.

Dates of Violation:

May 11, 2023

Causes and Duration of Violation:

At the time of the inspection, the dust collector baghouse was turned off by Century personnel for maintenance. This was done without shutting down the process allowing particulate emissions to escape the facility.

Ongoing Violations:
The violation has been corrected.

Summary of Actions Taken:
Maintenance personnel have been notified by Century management that the process is not to be operated without the baghouse control.

Proposed Corrective Actions:
Corrective actions have been implemented.

Dates of Corrective Actions Will Take Place:
Corrective actions have been implemented.

Reoccurrence:
A sign has been posted on the baghouse control warning plant maintenance personnel that the process must be shutdown whenever the baghouse is taken off line.

Process Description
FGPT3FURNACES
Aluminum Melting Furnaces

Rule/Permit Condition Violation
PTI No. 43-05C, FGPT3FURNACES Special Conditions i.2. & 3.

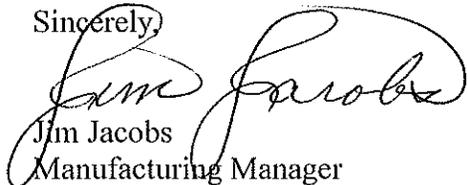
Comments
Exceedance of the permitted PM, PM10 and PM2.5 emission rates
7-18-22 PM10 = .4017, PM2.5 = .4017

Plant 3 is currently shut down due to a major fire. The future operation of Plant 3 is still in the planning stage.

A Management Practice Plan has been written and will be implemented for Plant 1 and 3 in an effort to reduce particulate emissions and reduce the emission of hazardous air pollutants (HAPs) in accordance with NESHAP ZZZZZZ – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Aluminum, Copper, and Other nonferrous Foundries, Section 63.11550.

If you have any questions, please contact Mr. Bill Hilton at (616) 574-8556 or email bhilton@resl.cc or Mr. Jim Jacobs at (231) 733-1572 or e-mail Jake@CenturyFoundry.com.

Sincerely,


Jim Jacobs
Manufacturing Manager