

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

B201573644

FACILITY: Metal Technologies, Inc. Three Rivers Gray Iron		SRN / ID: B2015
LOCATION: 429 Fourth Street, THREE RIVERS		DISTRICT: Kalamazoo
CITY: THREE RIVERS		COUNTY: SAINT JOSEPH
CONTACT: Dan Plant , Corporate Environmental Manager		ACTIVITY DATE: 06/20/2024
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On June 20, 2024 Air Quality Division (AQD) staff (Cody Yazzie, Mariah Scott, and Jared Edgerton) arrived at 429 Fourth Street, Three Rivers Michigan at 1:30 PM to conduct an unannounced air quality inspection of Dock Foundry LLC dba Metal Technologies, Inc. – Three Rivers Gray Iron (hereafter MTI) SRN (B2015). Staff made initial contact with the office receptionist and stated the purpose of the visit. Casey Brandy, MTI, Plant Manager, is the site contact and arrived shortly thereafter and took staff to a conference room for further discussions. Paul Kruggel, MTI, EHS Engineer is the site

The Facility is approximately four-tenths of a mile southeast of downtown Three Rivers in an industrial zoned area, with the nearest private residence located 400 feet east to northeast of the Facility. The Facility is a gray iron foundry that heats scrap in a gas fired pre-heater that feeds iron into four electric induction melt furnaces. Each induction furnace is equipped with a smoke ring to capture emissions when the charge lid is in the closed position, and all four furnaces and the gas fired pre-heater exhaust to the South Fuller baghouse and Small Dustar baghouse that share a common stack. Molten iron is tapped into a ladle and is then manually transferred to one of four green sand mold pouring lines to produce castings. Molds are then allowed to cool on conveyors that exhaust to an uncontrolled stack for each conveyor line. Cooled molds are then conveyed to the shakeout process to separate castings from sand and shakeout emissions are routed to the 2014 North Dustar baghouse. Casting and sand transfer operations exhaust to either the East and West Fuller, or West Dustar baghouses. Four wheelabrator machines used to shot blast clean the rough castings have emissions that exhaust to the North Fuller baghouse. Stand grinders on the east-west finishing line and the north-south finishing line exhaust to internally vented baghouse controls for each finishing line.

MTI was last inspected by the AQD on August 23, 2022 and appeared to be in Compliance at that time with MI-ROP-B2015-2019 Staff asked, and Mr. Brandy stated that the facility does not have any boilers or cold cleaners

Mr. Brandy and Mr. Kruggel gave staff a tour of the facility. Required personal protective equipment are steel toe boots, hearing protection, safety glasses, and . Staff observations and review of records provided during and following the inspection are summarized below:

EUSHAKEOUT:

This emission unit is the shakeout machine and associated equipment that separate iron castings to casting transfer, sand to the sand system, and sprue to the scrap bay. This emission unit includes 2-flat deck machines. In 2021 the facility appeared to replace the Didion unit with a flat deck. This was done in the 2021 exemption demonstration where the facility claimed to use Rule

285(2)(b) which exempts “changes in process or process equipment which do not involve installing, constructing, or reconstructing an emission unit and which do not involve any meaningful change in the quality and nature or any meaningful increase in the quantity of the emission of an air contaminant”.

This emission unit have two particulate matter (PM) emission limits that can only be verified through stack testing. These are the 0.04 pound per 1,000 pounds exhaust gases and the 11.9 pounds per hour PM limit. Testing is required every 5 years from the date of the last stack testing. The stack testing for this emission unit appears to be most recently conducted on March 7, 2023. The results from the stack test were noted as the following:

- PM 0.84 lb/hr (limit 11.9 lb/hr)
- PM 0.003 lb/1,000 lb exhaust gas (limit 0.04 lb/1,000 lb exhaust gas)
- PM10/2.5 2.73 lb/hr (limit 11.9 lb/hr)
- PM10/2.5 0.008 lb/1,000 lb exhaust gas (limit 0.04 lb/1,000 lb exhaust gas)

These appear to compliant with the permitted limits.

The facility also has a 5% opacity limit based on a 6-minute average. During the inspection there were no visible emissions observed from the stack.

The facility is required to not operate EUSHAKEOUT unless it is installed with a baghouse that is maintained and operated in a satisfactory manner. The facility is also required to equip the baghouses with pressure drops across the baghouse that are recorded at least once per day. Staff was provided with “work order” forms that included the daily pressure drop readings for each dust collector at the facility. If the facility did not operate the records appear to note this appropriately. The pressure drop reading appear to be recorded under 89-39 North DuStar Collector. MTI appears to be appropriately monitoring and recording this pressure drop value. Staff was provided with records for the time period of May 2023 through May 2024.

Special condition VI.1 require that the facility conduct a daily visible emission check and have the results recorded on a maintenance log. Staff was provided with “work order” forms that included the daily visible emission readings for each dust collector at the facility. On the forms it was noted that if MTI did not operate the records appear to note this appropriately. The visible emission observations appear to be identified under 89-39 North DuStar Collector. MTI appears to be appropriately observing and recording visible emissions as required. Staff was provided with records for the time period of May 2023 through May 2024.

Special condition VI.4 requires that the facility conduct quarterly inspections of the baghouse with a fluorescent detection device and record the results in the maintenance log. Staff was provided with the dates of the last four inspections. These blacklight inspections were conducted on the following dates: 9/2/2023, 11/25/2023, 2/18/2024, 5/19/2024.

Special condition VI.5 require that monthly records for the hours of operations and calculations of emissions of PM, PM10, and PM2.5 for the 2014 North Dustar baghouse/EUSHAKEOUT be maintained. It is also noted in the condition that these records are required for a period of 10 years after the installation of the 2014 North Dustar baghouse. The ROP indicates that the installation date as November 27, 2014. This minimum 10-year period would end November 27, 2024. Due to the language in the permit indicating that it is required for a minimum of 10 years

the facility should continue to maintain records until a discussion with the Kalamazoo District Office has been had to establish if the facility needs to continue to maintain these records.

Staff was provided with PM emissions calculations for the time period of December 2022 through May 2024. There is no emission limit on these PM emissions identified in the permit. The largest 12-month rolling PM emissions were calculated to be 1.182 TPY, which occurred in December 2023. The largest 12-month rolling PM10 emissions were calculated to be 5.647 TPY, which occurred in December 2023. The largest 12-month rolling PM2.5 emissions were calculated to be 5.647 TPY, which occurred in December 2023.

The facility is required to implement a preventive maintenance program for the baghouse and record result in a maintenance log. Staff was provided with maintenance activities logs that indicated what components are inspected or checked daily, weekly, and monthly.

During the inspection Staff did record differential pressure readings and bag break detection (BBD) values during the inspection. These values were obtained from a control room that is located to the southwest of the main manufacturing building. During the inspection DC#8 North DuStar had a differential pressure reading of 3.8 inches of water and a BBD value of 10.0 picoamps (pA).

It was noted during the previous inspection that there is an audible siren on the manufacturing floor if the BBD value exceeds the limit for 120 seconds. Staff noted that the BBD limit on the control panel was set to 13.0 pA during the inspection.

EUEMERGEN:

This emission unit is an existing diesel 250 HP John Deere engine that powers a 150 KW Kohler generator used for emergency power only. The engine is subject to 40 CFR Part 63, Subpart ZZZZ (existing CI RICE).

The facility maintains records of the operation hours daily and weekly. The records are taken by recording the hour meter reading daily. At the time of the inspection the engine had roughly 762 hours.

The facility is maintaining records of the maintenance on the engines. These maintenance records show if oil sample is taken, fans and belts being checked, and other inspected parts. The facility appears to be conducting this maintenance every 6 months. The most recent dates that the maintenance occurred were on 1/22/24.

FGGRAYIRON:

This flexible group that is operated for the metal preheating, charge unloading, melting, and pouring. EUVANETTA, EUBBFURN1, EUBBFURN2, EUBBFURN3, and EUBBFURN4 are all a part of this flexible group. These emission unit are controlled by a pulse jet baghouse (South Fuller), a reverse air (small Dustar) baghouse, and the South ETA pulse jet baghouse.

The stack testing for this emission unit appears to be most recently conducted on August 23, 2022. The stack tests are required to be conducted every 5 years from the date of last testing. The results from the stack test were noted as the following:

- PM - 0.0022 lb/1,000 lb exhaust gas (limit 0.01 lb/1,000 lb exhaust gas)
- PM - 0.488 lb/hr (limit 1.7 lb/hr)
- VE - 2.1%

The facility is required to not operate the equipment in FGGRAYIRON unless it is installed with a baghouse that is maintained and operated in a satisfactory manner. The facility is also required to equip the baghouses with pressure drops across the baghouse that are recorded at least once per day. Staff was provided with "work order" forms that included the daily pressure drop readings for each dust collector at the facility. If the facility did not operate the records appear to note this appropriately. The pressure drop readings for this flexible group appear to be identified under the following IDs: 89-46 ETA Collector, 89-06 South DuStar / Sly Collector. MTI appears to be appropriately monitoring and recording this pressure drop value. Staff was provided with records for the time period of May 2023 through May 2024.

Special condition VI.2 require that the facility conduct a daily visible emission check and have the results recorded on a maintenance log. Staff was provided with "work order" forms that included the daily visible emission readings for each dust collector at the facility. On the forms it was noted that if MTI did not operate the records appear to note this appropriately. The visible emission observations appear to be identified under the following: 89-46 ETA Collector, 89-06 South DuStar / Sly Collector. MTI appears to be appropriately observing and recording visible emissions as required. Staff was provided with records for the time period of May 2023 through May 2024.

Special condition VI.5 requires that the facility conduct quarterly inspections of the baghouse with a fluorescent detection device and record the results in the maintenance log. Staff was provided with the dates of the last four inspections. These blacklight inspections were conducted on the following dates: 9/2/2023, 11/25/2023, 2/18/2024, 5/19/2024.

This flexible group has a limit on the amount of iron that can be processed through FGGRAYIRON on a 12-month rolling basis. This limit is 219,000 tons per year and MTI is required to maintain recordkeeping of the amount of iron processed through FGGRAYIRON on a monthly basis. Staff was provided with monthly records for the time period of December 2022 through May 2024. The largest amount of iron processed was 152,129 tons, which occurred in December 2023. This is well below the permitted limit.

The facility is required to implement a preventive maintenance program for the baghouse and record result in a maintenance log. Staff was provided with maintenance activities logs that indicated what components are inspected or checked daily, weekly, and monthly.

During the inspection Staff did record differential pressure readings and bag break detection (BBD) values during the inspection. These values were obtained from a control room that is located to the southwest of the main manufacturing building. During the inspection DC#1 South ETA, DC#2 South Sly, and DC#3 South DuStar had a differential pressure reading of 4.2, 4.3, and 4.3 inches of water and a BBD value of 0.5, 0.0, and 0.0 pA respectively.

It was noted during the previous inspection that there is an audible siren on the manufacturing floor if the BBD value exceeds the limit for 120 seconds. Staff noted that the BBD limit on the control panel was set to 6.0 pA for DC#1 South ETA and 1.0 for DC#2 South Sly and DC#3 South DuStar during the inspection.

FGMOLDCOOLING:

This flexible group is for the mold cooling lines. EUMOLDCOOLING1, EUMOLDCOOLING2, EUMOLDCOOLING3, and EUMOLDCOOLING4 are all emission units that are included in the flexible group. There is no pollution control equipment associated with these units.

The stack testing for this emission unit appears to be most recently conducted on August 23, 2022. The stack tests are required to be conducted every 5 years from the date of last testing. The results from the stack test were noted as the following:

- FGMOLDCOOLING (Stack 1) -
 - PM 0.007 lb/1,000 lb exhaust gas (limit 0.10 lb/1,000 lb exhaust gas)
- FGMOLDCOOLING (Stack 2) -
 - PM - 0.011 lb/1,000 lb exhaust gas (limit 0.10 lb/1,000 lb exhaust gas)
- FGMOLDCOOLING (Stack 3) -
 - PM 0.008 lb/1000 lb exhaust gas (limit 0.10 lb/1,000 lb exhaust gas)
- FGMOLDCOOLING (Stack 4) -
 - PM 0.005 lb/1,000 lb exhaust gas (limit 0.10 lb/1,000 lb exhaust gas)

Special condition VI.1 requires that the facility conduct a daily non-certified visible emission check and have the results recorded on a maintenance log. Staff was provided with "work order" forms that included the daily visible emission readings for each dust collector at the facility. On the forms it was noted that if MTI did not operate the records appear to note this appropriately. The visible emission observations appear to be identified under the following: 89-00 Cooling Line Stacks 1 - 4. MTI records these records by indicating only if abnormal or no abnormal visible emissions are observed. Staff was provided with records for the time period of May 2023 through May 2024.

During the inspection Staff did observe visible emissions from the roof for this flexible group. It was noted during the inspection that Stacks 1 and 2 had visible emissions that staff would estimate to be around 10-15% opacity. Stacks 3 and 4 Staff noted that there were no visible emissions observed. Staff was not able to conduct a formal method 9 observation due to the location of the stacks and sun position at the time of the inspection.

General Condition 11 in the ROP outlines that unless otherwise specified in the ROP that the permittee shall comply with Rule 301, which limits visible emissions from a process or process equipment is limited to 20% opacity on a 6-minute average, except for one 6-minute average per hour of not more than 27% opacity. Staff wanted to note that this process appears to have the ability to exceed this limit, but since a proper method 9 reading was not conducted and Staff estimates reading to be roughly 10-15% opacity that the limit was not exceeded during the inspection.

FGGEWFULLER:

This flexible group is for the casting accumulator, transfer, shot sand reclaim drum magnet, sand screens, and separators. EUSAND1 and EUCASTTRANSFER1 are all emission units that are included in the flexible group. These emission units are controlled by the East and West Fuller baghouses. These two baghouses converge into one stack that only has the single exhaust point.

The stack testing for this emission unit appears to be most recently conducted on March 7, 2023. The stack tests are required to be conducted every 5 years from the date of last testing. The results from the stack test were noted as the following:

- PM 10.1 lb/hr (limit 15.8 lb/hr)
- PM 0.27 lb/1,000 lb exhaust gas (limit 0.04 lb/1,000 lb exhaust gas)

MTI has a 5% opacity limit based on a 6-minute average. During the inspection there were no visible emissions observed from the stack.

The facility is required to not operate the equipment in FGEWFULLER unless it is installed with a baghouse that is maintained and operated in a satisfactory manner. The facility is also required to equip the baghouses with pressure drops across the baghouse that are recorded at least once per day. Staff was provided with "work order" forms that included the daily pressure drop readings for each dust collector at the facility. If the facility did not operate the records appear to note this appropriately. The pressure drop readings for this flexible group appear to be identified under the following IDs: 89-04 East Fuller Dust Collector and 89-05 West Fuller Dust Collector. MTI appears to be appropriately monitoring and recording this pressure drop value. Staff was provided with records for the time period of May 2023 through May 2024.

Special condition VI.1 require that the facility conduct a daily visible emission check and have the results recorded on a maintenance log. Staff was provided with "work order" forms that included the daily visible emission readings for each dust collector at the facility. On the forms it was noted that if MTI did not operate the records appear to note this appropriately. The visible emission observations appear to be identified under the following: 89-04 East Fuller Dust Collector and 89-05 West Fuller Dust Collector Stack. MTI appears to be appropriately observing and recording visible emissions as required. Staff was provided with records for the time period of May 2023 through May 2024.

Special condition VI.4 requires that the facility conduct quarterly inspections of the baghouse with a fluorescent detection device and record the results in the maintenance log. Staff was provided with the dates of the last four inspections. These blacklight inspections were conducted on the following dates: 9/2/2023, 11/25/2023, 2/18/2024, 5/19/2024.

The facility is required to implement a preventive maintenance program for the baghouse and record result in a maintenance log. Staff was provided with maintenance activities logs that indicated what components are inspected or checked daily, weekly, and monthly.

During the inspection Staff did record differential pressure readings and bag break detection (BBD) values during the inspection. These values were obtained from a control room that is located to the southwest of the main manufacturing building. During the inspection DC#4 East Fuller and DC#5 West Fuller had a differential pressure reading of 4.7 and 5.3 inches of water and a BBD value of 18.0 and 163.0 pA respectively.

It was noted during the previous inspection that there is an audible siren on the manufacturing floor if the BBD value exceeds the limit for 120 seconds. Staff noted that the BBD limit on the control panel was set to 325 pA for DC#4 East Fuller and 250 for DC#5 West Fuller during the inspection.

FGWDUSTAR:

This flexible group is the process that uses sand system conveyors, mullers, casting transfer points, and a sand scalper. The Didion and flat deck are primarily used in the EUSHAKOUT. It was indicated to Staff that there are some emissions that are controlled by the West Dustar baghouse. It was suggested to remove the Didion and flat deck from the FGWDUSTAR description as these equipment are primarily associated with the EUSHAKEOUT. EUSAND2 and EUCASTTRANSFER2 are all emission units that are included in the flexible group. These emission units are controlled by the reverse air West DuStar baghouse.

FGWDUSTAR and FGCLEANING have two separate baghouse units that exhaust out the same stack. This is seen in the ROP by both flexible groups have the same Stack ID: SV565-932. When it comes to stack testing the facility appears to test the emission units with the same stack test. The stack testing for these flexible group appears to be most recently conducted on March 7, 2023. The stack tests are required to be conducted every 5 years from the date of last testing. The results from the stack test were noted as the following:

- PM 1.17 lb/hr (limit 13.5 lb/hr)
- PM 0.002 lb/1,000 lb exhaust gas (limit 0.02 lb/1,000 lb exhaust gas)

The facility also has a 5% opacity limit based on a 6-minute average. During the inspection there were no visible emissions observed from the stack.

The facility is required to not operate the equipment in FGWDUSTAR unless it is installed with a baghouse that is maintained and operated in a satisfactory manner. The facility is also required to equip the baghouses with pressure drops across the baghouse that are recorded at least once per day. Staff was provided with "work order" forms that included the daily pressure drop readings for each dust collector at the facility. If the facility did not operate the records appear to note this appropriately. The pressure drop readings for this flexible group appear to be identified under the following IDs: 89-42 West DuStar. MTI appears to be appropriately monitoring and recording this pressure drop value. Staff was provided with records for the time period of May 2023 through May 2024.

Special condition VI.1 require that the facility conduct a daily visible emission check and have the results recorded on a maintenance log. Staff was provided with "work order" forms that included the daily visible emission readings for each dust collector at the facility. On the forms it was noted that if MTI did not operate the records appear to note this appropriately. The visible emission observations appear to be identified under the following: 89-42 West DuStar. MTI appears to be appropriately observing and recording visible emissions as required. Staff was provided with records for the time period of May 2023 through May 2024.

Special condition VI.4 requires that the facility conduct quarterly inspections of the baghouse with a fluorescent detection device and record the results in the maintenance log. Staff was provided with the dates of the last four inspections. These blacklight inspections were conducted on the following dates: 9/2/2023, 11/25/2023, 2/18/2024, 5/19/2024.

The facility is required to implement a preventive maintenance program for the baghouse and record result in a maintenance log. Staff was provided with maintenance activities logs that indicated what components are inspected or checked daily, weekly, and monthly.

During the inspection Staff did record differential pressure readings and bag break detection (BBD) values during the inspection. These values were obtained from a control room that is located to the southwest of the main manufacturing building. During the inspection DC#6 West DuStar had a differential pressure reading of 3.4 inches of water and a BBD value of 1.5 pA.

It was noted during the previous inspection that there is an audible siren on the manufacturing floor if the BBD value exceeds the limit for 120 seconds. Staff noted that the BBD limit on the control panel was set to 51 pA for DC#6 West DuStar during the inspection.

FGCLEANING:

This flexible group is for the process which is used to clean the iron castings in shotblast machines. EUBLAST1, EUBLAST2, EUBLAST3, and EUBLAST4 are all emission units that are included in the flexible group. These emission units are controlled by the North Fuller Pulse Jet baghouse.

FGWDUSTAR and FGCLEANING have two separate baghouse units that exhaust out the same stack. This is seen in the ROP by both flexible groups have the same Stack ID: SV565-932. When it comes to stack testing the facility appears to test the emission units with the same stack test. The stack testing for these flexible group appears to be most recently conducted on March 7, 2023. The stack tests are required to be conducted every 5 years from the date of last testing. The results from the stack test were noted as the following:

- PM 0.002 lb/1,000 lb exhaust gas (limit 0.02 lb/1,000 lb exhaust gas)

The facility is also required to record the pressure drops across the baghouse at least once per day. Staff was provided with "work order" forms that included the daily pressure drop readings for each dust collector at the facility. If the facility did not operate the records appear to note this appropriately. The pressure drop readings for this flexible group appear to be identified under the following IDs: 89-03 North Fuller Dust Collector. MTI appears to be appropriately monitoring and recording this pressure drop value. Staff was provided with records for the time period of May 2023 through May 2024.

Special condition VI.1 require that the facility conduct a daily visible emission check and have the results recorded on a maintenance log. Staff was provided with "work order" forms that included the daily visible emission readings for each dust collector at the facility. On the forms it was noted that if MTI did not operate the records appear to note this appropriately. The visible emission observations appear to be identified under the following: 89-03 North Fuller Dust Collector. MTI appears to be appropriately observing and recording visible emissions as required. Staff was provided with records for the time period of May 2023 through May 2024.

Special condition VI.4 requires that the facility conduct quarterly inspections of the baghouse with a fluorescent detection device and record the results in the maintenance log. Staff was provided with the dates of the last four inspections. These blacklight inspections were conducted on the following dates: 9/2/2023, 11/25/2023, 2/18/2024, 5/19/2024.

The facility is required to implement a preventive maintenance program for the baghouse and record result in a maintenance log. Staff was provided with maintenance activities logs that indicated what components are inspected or checked daily, weekly, and monthly.

During the inspection Staff did record differential pressure readings and bag break detection (BBD) values during the inspection. These values were obtained from a control room that is located to the southwest of the main manufacturing building. During the inspection DC#7 North Fuller had a differential pressure reading of 6.2 inches of water and a BBD value of 25.0 pA.

It was noted during the previous inspection that there is an audible siren on the manufacturing floor if the BBD value exceeds the limit for 120 seconds. Staff noted that the BBD limit on the control panel was set to 550.0 pA for DC#7 North DuStar during the inspection.

FGCAM UNITS:

This flexible group consists of emission units that use a control device to achieve compliance with a federally enforceable emission limitation or standard for particulate matter. The emission units have potential pre-control emissions, which are over 100 percent of the major source threshold amount (at a level considered to be major under the ROP program) for particulate matter.

MTI is required to perform and maintain daily records of both visible emission observations and pressure drop readings across the baghouses. As noted in their respective flexible group and emission unit sections above that the facility appears to appropriately maintain records of these observations and readings. In the records review the baghouse differential pressures appeared to be in normal operating ranges. The facility indicated that there have been no excursions or exceedances.

FGMACTEEEE:

This flexible group contains equipment under the existing iron/steel foundry NESHAP. This includes EUVANETTA, EUBBFURN1, EUBBFURN2, EUBBFURN3, and EUBBFURN4.

In order to comply with the scrap certification requirements in 40 CFR Part 63 Subpart EEEEE, MTI uses a Scrap Certification program for purchase and use of only metal ingots, pig iron, slitter, or other materials that do not include post-consumer automotive body scrap, post-consumer engine blocks, post-consumer oil filters, oily turnings, lead components, mercury switches, plastics, or free organic liquids. This plan also clearly lays out the metal composition they will take. During the inspection it was noted that no liquids were observed draining from the metal chips in the scrap area.

The facility is also equipped with an interlock system on the differential pressure meters in the baghouses. If something occurs in the process that causes the differential pressures of the baghouses to exceed the set parameters in the baghouse it will cause the equipment is stopped to allow time for fixes and maintenance.

The facility is required to show compliance with the PM or Total HAP emission limit in Special Condition I.2 every 5-years. The last test was conducted on August 23, 2022. During this test it showed the following results:

- PM - 0.0006 gr/dscf (limit 0.005 gr/dscf)
- PM - 0.13 lb/hr (no limit)

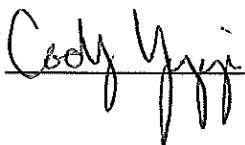
The facility is required to comply with a 20% opacity (fugitive) on a 6-minute average limit in Special Condition I.1. These fugitive tests are required for each building or structure housing any

iron or Steel Foundry emission source. The facility takes these emission readings at the open bay storage/loading area located on the southeast side of the building. The facility appears to be conducting certified visible emission readings. During the inspection Staff did observe some fugitive emissions. Staff did not take a certified method 9 reading as Staff estimated opacity to be around 5% and only lasted intermittently.

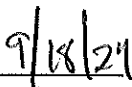
Conclusion:

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in compliance with MI-ROP-B2015-2019. Staff stated to Mr. Plant that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 3:30 PM.-CJY

NAME



DATE



SUPERVISOR

