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

N581472971

FACILITY: ASAMA COLDWATER MANUFACTURING, INC.		**SRN / ID:** N5814
LOCATION: 180 Asama Parkway, COLDWATER		**DISTRICT:** Kalamazoo
CITY: COLDWATER		**COUNTY:** BRANCH
CONTACT: John Glant , EHS Coordinator		**ACTIVITY DATE:** 07/17/2024
STAFF: Michael Cox	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled Unannounced Inspection		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Michael Cox (MTC) completed an unannounced inspection of Asama Coldwater Manufacturing, Inc. (ACM) at 9:00 AM on July 17, 2024, located at 180 Asama Parkway, Coldwater, Michigan. The purpose of this inspection was to verify the facility was in compliance with Renewable Operating Permit (ROP) MI-ROP-N5814-2021, 40 CFR Part 63, Subparts A and EEEEE, 40 CFR Part 63, Subpart MMMM, and all other applicable air quality rules and regulations Visible emissions and odor observations were taken prior to entering the facility. No visible emissions or odors were observed.

Facility Description

ACM operates two grey iron foundries that produce brake components. The existing George Fischer (GF) foundry is named after its manual pour molding line, which commenced operation in 1997. The newer DISA foundry is named after its automated pour molding line, which commenced operation in 2007. ACM uses green sand molds comprised of a combination of western and southern bentonite clays as well as sea coal as a binder. The facility has also installed two brake rotor coating lines. Mr. John Glant is ACM EHS Manager. He and Mr. David Sutherland walked me around the facility. The George Fischer and DISA foundries were in operation during the inspection. All air pollution equipment was running at the time of the inspection and the foundry was operating at full capacity.

Regulatory Analysis

ACM is a major source of hazardous air pollutants (HAPs), Nitrous Oxides (NOx), and Particulate Matter (PM). The facility is currently operating under Renewable Operating Permit (ROP) MI-ROP-N5814-2021. The facility's existing foundry (GF foundry) is subject to 40 CFR Part 63, Subpart A and EEEEE, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Iron and Steel Foundries. The facility's coating operation is subject to 40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. The facility's two emergency generators are subject to New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart A and IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, as well as 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Compliance Evaluation

Upon entering the facility, AQD staff MTC met with Mr. John Glant, EHS Coordinator, and Mr. David Sutherland, Senior Human Resources Manager. MTC explained the purpose of the inspection. Mr. Glant and Mr. Sutherland provided a walk-through of the facility and answered site-specific questions. ACM's consultant, Jill Koebbe provided requested records following the inspection.

EU-GFMELTPOUR:

This emission unit consists of the George Fisher Foundry (GF Foundry) metal melting, pouring, and casting cooling equipment with two electric induction furnaces with a combined daily average melting capacity of 8 tons per hour (tph). Emissions are controlled with a 49,000 cfm #GF608, four-cell baghouse that is equipped with bag leak detection (BLD) equipment. The BLD system is equipped with an alarm that is set and locked so it cannot be adjusted by foundry staff. During the inspection, it read 20.8 pA. An audible alarm calibrated to 60% and 80% of scale with a 3-second alarm delay.

Each cell of the baghouse has a dedicated photohelic differential pressure gauge that is calibrated annually. During the inspection, the readings from the gauges were recorded; NE read 5.0", SE read 6.0", SW read 8.0", and NW read 6.5". All the photohelic gauges at the facility were calibrated on October 22, 2023. The baghouse weekly and monthly PMs are completed by foundry staff. BLD readings are done during the daily parametric monitoring checks and broken bags changed as needed. Daily Method 22 visible emissions readings are being performed as required. The differential pressure is checked daily during the walkaround PM checklist.

Emission rates of Carbon Monoxide (CO), Particulate Matter (PM), and Volatile Organic Compounds (VOCs) are required to be verified via testing every five years. The last performance testing was conducted on June 22-25 and July 14-17, 2020, which showed the following emission rate results:

Pollutant	Limit	Time period/ Operating Scenario	Testing Result
CO	57.5 pph	Hourly	24.2 pph
PM	0.005 gr/dscf exhaust gases or 2.1 pph	Hourly	0.02 pph
VOC	10.0 pph	Hourly	6.4 pph

The furnace is tapped manually by employees. The ladle is then guided over by hand to the pouring station. The molds are poured by hand beneath a hood until the ladle is empty and then it is guided back to be filled again. While the one furnace was being tapped, the other furnace was being loaded with scrap for melting.

The facility submitted examples of the daily/weekly parametric monitoring readings that are taken for all the George Fischer foundry elements for the time period of May 2022 through May 2024. These are considered to be a random, representative sample of the recordkeeping at the facility. All emission units that are in the GF foundry are recorded on the same sheet with the same frequency. Daily visible emission readings are also conducted on the GF Foundry stacks No issues were noted during the review of the records and no visible emissions were noted by facility staff.

The scrap storage area was also observed during the walk through. It was active and in use as the foundry was operational. Scrap is stored indoors in sorted bins of pig iron, clean scrap, and internal returns. The scrap is not preheated before being loaded into the furnace. A crane equipped with a magnet is used to bring over the scrap and load a cart which is then used to fill the furnace with the scrap before the melting process begins.

One stack is listed in association with EU-GFMELTPOUR in MI-ROP-N5814-2021. The stack appeared to be consistent with the diameters specified in the ROP.

EU-GFSANDSYS:

This emission unit consists of the GF Foundry mold making, shakeout, and sand processing equipment. Emissions are controlled by a 65,000-cfm pulse jet #GF610 baghouse that is equipped with BLD equipment.

Sand, bentonite clay, water, seal coal, and return sand are used to produce molds for the GF foundry. During the inspection, the photohelic differential pressure gauge read 6.5" and the BLD system was noted to be reading 19.8 pA. An audible alarm calibrated to 60% and 80% of scale with a 3-second alarm delay. All the photohelic gauges at the facility were calibrated on October 22, 2023.

Emission rates of Carbon Monoxide (CO), Particulate Matter (PM), and Volatile Organic Compounds (VOCs) are required to be verified via testing every five years. The last performance testing was conducted on June 22-25 and July 14-17, 2020, which showed the following emission rate results:

Pollutant	Limit	Time period/ Operating Scenario	Testing Result
CO	7.5 pph	Hourly	1.3 pph
PM	0.005 gr/dscf exhaust gases or 2.8 pph	Hourly	0.059 pph

VOC	**6.0 pph**	**Hourly**	**2.2 pph**

The facility submitted examples of the daily/weekly parametric monitoring readings that are taken for all the George Fischer foundry elements for the time period of May 2022 through May 2024. These are considered to be a random, representative sample of the recordkeeping at the facility. All emission units that are in the GF foundry are recorded on the same sheet with the same frequency. No issues were noted during the review of the records.

A BLD system is installed on the GF sand system. Readings are recorded daily, once per shift. Visible emissions from the exhaust stacks are observed daily, while operating, during daylight hours, for at least six minutes. Instructions indicate that if dust is noticed, to notify EQS. After a review of the above referenced parametric monitoring records, no visible emissions were noted by facility staff.

One stack is listed in association with EU-GFSANDSYS in MI-ROP-N5814-2021. The stack appeared to be consistent with the diameters specified in the ROP.

EU-SHOTBLAST:

This emission unit consists of a shot blast machine with a mechanical pre-cleaner. Emissions are controlled by a 7,500-cfm pulse jet #BH603 baghouse that is equipped with BLD equipment.

PM emissions are limited to 0.01 pounds per 1,000 pounds of exhaust gases. This emission rate is verified through testing upon request of the Kalamazoo District Supervisor. As of the date of this inspection, testing for the PM emission rate has not been requested

During the inspection, the equipment was in operation and the photohelic differential pressure gauge was observed at 6.5" and the BLD system was noted to be reading 4.3 pA during the inspection. The BLD system is equipped with an audible alarm calibrated to 60% and 80% of scale with a 3-second alarm delay. All the photohelic gauges at the facility were calibrated on October 22, 2023.

The facility submitted examples of the daily/weekly parametric monitoring readings that are taken for all the George Fischer foundry elements for the time period of May 2022 through May 2024. These are considered to be a random, representative sample of the recordkeeping at the facility. All emission units that are in the GF foundry are recorded on the same sheet with the same frequency. Visible emissions from the exhaust stacks are observed daily, while operating, during daylight hours, for at least six minutes. Instructions indicate that if dust is noticed, to notify EQS. After a review of the above referenced parametric monitoring records, no visible emissions were noted by facility staff. Daily photohelic readings are taken at least once per shift. If the photohelic gauges are reading outside the expected ranges, the EHS manager is to be notified. No issues were noted during the review of the records.

EU-DSMELTPOUR:

This emission unit consists of two electric induction furnaces with a 10-metric ton holding capacity each and a monorail pouring system with three ladles. According to

previous inspection reports, the average daily melting capacity is about 16 tons/hour. Emissions are controlled by the 37,500-cfm pulse jet #DS602 baghouse that is equipped with BLD equipment.

Both furnaces were in operation during the inspection. Similar to the other BLD systems on site, the system is equipped with an audible alarm at 60% and 80% of scale with a 3-second alarm delay. During the inspection, the fan amperage on the #DS602 baghouse was 145 motor amps. The BLD system was noted to be reading 4.8 pA and the differential pressure was 3.5". All the photohelic gauges at the facility were calibrated on October 22, 2023.

Emission rates of Carbon Monoxide (CO), Particulate Matter (PM), and Volatile Organic Compounds (VOCs) are required to be verified via testing every five years. The last performance testing was conducted on June 22-25 and July 14-17, 2020, which showed the following emission rate results:

Pollutant	Limit	Time period/ Operating Scenario	Testing Result
PM10	0.30 pph	Hourly	0.24 pph
VOC	5.28 pph	Hourly	1.32 pph
CO	44.55 pph	Hourly	7.15 pph

The facility submitted examples of the daily/ weekly readings that are taken for all the DISA foundry elements for the time period of May 2022 through May 2024. These are considered to be a random, representative sample of the recordkeeping at the facility. All emission units that are in the DISA foundry are recorded on the same sheet with the same frequency. Bag leak detection is installed on the DISA melt pour system. Readings are recorded daily, once per shift. Other readings taken include fan amperage, differential pressure, and visual inspection of damper position. The exhaust stacks are observed daily, while operating, during daylight hours, for at least six minutes. Instructions indicate that if dust is noticed, to notify EQS. After a review of the above referenced parametric monitoring records, no visible emissions were noted by facility staff. No issues were noted.

One stack is listed in association with EU-DSMELTPOUR in MI-ROP-N5814-2021. The stack appeared to be consistent with the diameters specified in the ROP.

EU-DSCOOLSHAK:

This emission unit consists of automated mold cooling conveyors and automated sand shakeout lines, including a flat deck shakeout system. Emissions are controlled by a 61,200-cfm pulse jet #DS606 baghouse equipped with a BLD alarm system and a regenerative thermal oxidizer (RTO) installed in July 2013 under an AQD administrative consent order No. 14-2013 and PTI No. 28-06B.

The baghouse serving EU-DSCOOLSHAK is a single cell baghouse with a magnehelic pressure differential gauge. During the inspection, the differential pressure reading was 7.0", the fan amperage was 135 motor amps, and BLD read 50 pA. The duel-bed RTO switches over every 3 minutes and has a minimum temperature of 1,350°F specified in the facilities submitted Operation and Maintenance Plan (OMP). During the inspection the RTO was noted to be operating at 1,358°F, with a reading of 2.5 inches of water differential pressure at the inlet, and 13 inches of water differential for the outlet pressure.

A continuous monitoring system (CEMS) continuously monitors and records VOC emissions which are assumed to equal the Volatile Organic Hazardous Air Pollutant (VOHAP) emissions and are also used to calculate a 3-hour rolling average VOHAP concentration to determine compliance with 40 CFR 63.7690(a)(10). At the time of the inspection, the CEMs was reading the following: 3.4 ppmv instantaneous, 2.8 one-hour average, 3.0 ppmv 3-hour rolling. The VOHAP concentration is 15% of the allowable limit in the NESHAP Subpart EEEEE.

Emission rates of VOHAP, PM-10, VOC, and CO are required to be verified via testing every five years. The last performance testing was conducted on June 22-25 and July 14-17, 2020, which showed the following emission rate results:

Pollutant	Limit	Time period/ Operating Scenario	Testing Result
Volatile Organic HAP (VOHAP)	A flow-weighted average of 20 ppmv	Hourly	3 ppmvd (3-hour avg during inspection)
PM10	2.47 pph	Hourly	1.01 pph
VOC	15.49 pph	Hourly	2.24 pph
CO	62.70 pph	Hourly	12.4 pph

The facility is tracking all VOC as VOHAP to satisfy the requirement to track the 3-hour average VOHAP concentration using the CEMS. EHS personnel and the facility's consultant provided the PM maintenance sheets that are kept daily at the facility for tracking purposes. Facility staff checks the CEMS unit, computer, record the 3-hour VOC average, RTO temperature, and other factors once per shift. The CEMs unit logs instantaneous, 1-minute, and 3-hour VOC averages.

The facility is using VOC as VOHAP as a worst-case scenario as it's unlikely that all the VOC being emitted are HAPs. Daily readings are recorded for the fan motor amperage, differential pressure, and the visual inspection of the damper position. The facility provided parametric monitoring readings for the time period of May 2022 through May 2024. After a review of the above referenced parametric monitoring records, no visible emissions were noted by facility staff. No issues were noted.

One stack is listed in association with EU-DSCOOLSHAK in MI-ROP-N5814-2021. The stack appeared to be consistent with the diameters specified in the ROP.

EU-DSMOLDSAND:

This emission unit consists of vertical molding and related sand handling equipment. The emissions are controlled by a 56,900-cfm pulse jet #DS608 baghouse equipped with BLD equipment. This is a single cell baghouse with a magnehelic differential pressure gauge.

During the inspection, the baghouse pressure drop reading was 5.0", fan amperage was 171 motor amps, and the BLD read 20.8 pA. The BLD is equipped with an alarm, similar to the other baghouse settings but has an alarm delay of 90 seconds.

Emission rates for PM-10 and VOC are required to be verified via testing every five years. The last performance testing was conducted on June 22-25 and July 14-17, 2020, which showed the following emission rate results:

Pollutant	Limit	Time period/ Operating Scenario	Testing Result
PM10	2.3 pph	Hourly	0.51 pph
VOC	4.0 pph	Hourly	0.43 pph

The facility provided parametric monitoring readings for the time period of May 2022 through May 2024. Records show daily readings are taken for fan motor amperage, differential pressure, and a visual inspection of the damper position. The high and low acceptable readings are noted and there are instructions to notify EQS if anything is above 8.0" H2O for the differential pressure readings. After a review of the above referenced parametric monitoring records no issues were noted.

One stack is listed in association with EU-DSMOLDSAND in MI-ROP-N5814-2021. The stack appeared to be consistent with the diameters specified in the ROP.

EU-DSCOOLSHOT:

This emission unit consists of the back section of the casting cooling conveyors and a shot blast machine for the DISA foundry. Emissions are controlled by a 65,360-cfm pulse jet #DS604 baghouse that has one cell and is equipped with a magnehelic pressure differential gauge.

During the inspection, the baghouse pressure drop read 5.6", fan amperage was 179 motor amps, and the BLD system read 139 pA. The BLD is equipped with an alarm, similar to the other baghouse settings but has an alarm delay of 90 seconds.

Emission rates for PM-10 are required to be verified via testing every five years. The last performance testing was conducted on June 22-25 and July 14-17, 2020, which showed the following emission rate results:

Pollutant	Limit	Time period/ Operating Scenario	Testing Result
PM10	2.64 pph	Hourly	1.87 pph

The facility provided parametric monitoring readings for the time period of May 2022 through May 2024. Records show daily readings are taken for fan motor amperage, differential pressure, and a visual inspection of the damper position. The high and low acceptable readings are noted and there are instructions to notify EQS if anything is above 8.0" H2O for the differential pressure readings. After a review of the above referenced parametric monitoring records no issues were noted.

One stack is listed in association with EU-DSCOOLSHOT in MI-ROP-N5814-2021. The stack appeared to be consistent with the diameters specified in the ROP.

EU-EMERGEN1:

This emission unit consists of a 500 kW Cummins brand, diesel-fired, emergency power generator that was installed with the new DISA foundry. This emergency generator is subject to 40 CFR Part 60, Subpart IIII.

Preventative maintenance is conducted by an outside contractor on an annual basis. A maintenance checklist and hours log are posted in the generator containment. Staff stated the generator is tested for about 10-20 minutes every Monday. The non-resettable hours meter was noted to be 713.2 hours at the time of the inspection. The fuel supplier for the emergency generator is Warner Oil Company that certified that the fuel was ultra-low sulfur diesel fuel which is 15% ppm or less of sulfur. It was noted that all hours operated by this engine during the time period covered by this inspection were for maintenance and readiness testing. The engine did not go over the 100-hour operating hour time limit for this type of use.

EU-EMERGEN2:

This emission unit consists of a 50-kW natural gas fired emergency power generator that was installed with the existing foundry. The emergency generator is subject to 40 CFR Part 63, Subpart ZZZZ based on the installation date.

The engine is serviced by an outside vendor on an annual basis. The non-resettable hours meter read 553.7 hours at the time of the inspection. It was noted that all hours operated by this engine during the time period covered by this inspection were for maintenance and readiness testing. The engine did not go over the 100-hour operating hour time limit for this type of use.

FG-GFFOUNDRY:

This flexible group includes two emission units: EU-GFMELTPOUR, EU-GFSANDSYS.

The following is a summary of the flexible group's emission limits and highest 12-consecutive month rolling value derived from the emission records provided by the facility for the time period of July 2022 through July 2024:

Pollutant	Limit	Time period/ Operating Scenario	Records
PM	19.4 tpy	12-Month Rolling	0.1421 tpy during the 12-month period ending in December 2023.
CO	156.0 tpy	12-Month Rolling	55.36 tpy during the 12-month period ending in November 2022.
VOC	38.4 tpy	12-Month Rolling	13.63 tpy during the 12-month period ending in November 2022.

The following is a summary of the flexible group's material limits and highest 12-consecutive month rolling value derived from the records provided by the facility for the time period of July 2022 through July 2024:

Material	Limit	Time Period	Records
Metal	Metal melt rate shall not exceed 48,000 tons per year.	12-Month Rolling	16,962.02 tons during the 12-month period ending in May 2024.
Hours	7,872 hours	12-Month Rolling	3,485.2 Hours during the 12-month period ending in December 2023.

After a review of the records provided no issues were noted.

FG-COLDCLEANERS:

There are two cold cleaners that contain mineral spirits located in the foundry maintenance area and the M/C tool room. Two non-VOC cleaners are in the tool preset area and in the forklift maintenance area. The cleaners were noted to be closed during the inspection. SDS was provided for the facility which indicate that the contents of the cleaners containing mineral spirits is Crystal Clean 142 Mineral Spirits, CAS# 64742-47-8, which has a VOC content of 100%. Crystal Clean is a third-party vendor that services the cleaners.

FG-RULE290:

This flexible group consists of emission unit EU-CONVEYOR, a casting, cooling, vibratory covered conveyor that is ventilated through a 28,000-cfm dust collector. The calculations use an EPA emission factor for grey iron foundry emissions for PM-10, filterable. The particulate is comprised of residual molding sand left on castings being transported. There are no toxics associated with the sand. Records requested for the time period of July 2022 through July 2024 were provided by the facility. It was noted that controlled emissions from this conveyor are between 4.8 lbs/month and 7.4 lbs/month. This is well below the allowed 500 lbs/month in Rule 290.

FGCAMUNITS:

This flexible group contains EU-GFSANDSYS, EU-DSCOOLSHAK, EU-DSMOLDSAND, and EU-DSCOOLSHOT.

The facility is required to perform, monitor, and record daily pressure drop readings, daily non-certified visible emissions checks, and daily bag leak detection readings. The facility submitted examples of the daily/weekly parametric monitoring readings that are taken for the time period of May 2022 through May 2024. These are considered to be a random, representative sample of the recordkeeping at the facility. Visible emissions from the exhaust stacks are observed daily, while operating, during daylight hours, for at least six minutes. Instructions indicate that if dust is noticed, to notify EQS. After a review of the above referenced parametric monitoring records, no visible emissions were noted by facility staff. Daily photohelic readings are taken at least once per shift. If the photohelic gauges are reading outside the expected ranges, the EHS manager is to be notified. No issues were noted during the review of the records.

CEMS daily records were submitted as part of the records review. The facility is tracking the pressure drop once per shift and they complete daily emissions recordings once a day during first shift. Noted during the inspection, the facility has bag leak detection on the baghouses at the facility. The picoamps are monitored continuously. No issues noted.

FG-DSFOUNDRY:

This flexible group consists of all emission units of the new expansion foundry: EU-DSMELTPOUR (EU-MP-S1), EU-DSCOOLSHAK (EU-MCS-S1), EU-DSMOLDSAND (EU-SSS1), EU-DSCOOLSHOT (EU-CCFBACK-S1)

The following is a summary of the flexible group's emission limits and highest 12-consecutive month rolling value derived from the emission records provided by the facility for the time period of July 2022 through July 2024:

Pollutant	Limit	Time period/ Operating Scenario	Records
PM10	27.0 tpy	12-Month Rolling	13.8726 tpy during the 12-month period ending in May 2024.
CO	375.5 tpy	12-Month Rolling	

			192.67 tpy during the 12-month period ending in May 2024.
VOC	**86.6 tpy**	**12-Month Rolling**	**44.46 tpy during the 12-month periods ending in April and May 2024.**
Opacity	**20% or 27%**	**6-min average**	**Checked daily**

The following is a summary of the flexible group's material limits and highest 12-consecutive month rolling value derived from the records provided by the facility for the time period of July 2022 through July 2024:

Material	**Limit**	**Time Period**	**Records**
Metal	**Metal melt rate shall not exceed 115,500 tons per year.**	**12-Month Rolling**	**59,285 tpy during the 12-month period ending in November 2023.**

The facility checks the span gas bottles, air dryer, CMEDAS software including alarm software, analyzer, data logging, and RTO. The facility previously provided an outline of their scrap certification plan that is in place on site.

FG-PAINTLINES:

This flexible group consists of two GEOMET paint line systems each consisting of a mixing room, a paint spray booth equipped with HVLP applications and dry filter overspray control and also has an induction cure process consisting of pre-curing and final cure steps for coating of metallic surfaces.

The facility uses an excel spreadsheet to track emissions and coating content at the facility. The volume percent of non-volatile materials, weight percent of HAP, density, VOC + exempt, VOC – exempt, and pound HAP per gallon of coating are contained in the spreadsheet for coatings used at the facility. The chemical composition of the coating used is also listed in the spreadsheet. Records for the time period of July 2022 through July 2024 were requested and provided by the facility. From the records review, Gallons of GEOMET paint used is being tracked by line. This flexible group has a VOC limit of 2,000 pounds per month for each paint line. After reviewing the records both paint lines were consistently under this limit. The highest pounds of VOC used for Paint Line 1 was noted to be 422 pounds of VOC during the month of June 2023. The highest pounds of VOC used for Paint Line 2 was noted to be 551 pounds of VOC during the month of August 2023. The highest 12-month rolling VOCs calculated across both lines showed that the highest amount of VOCs emitted was 4.196 tons in June 2024, which is below the 10-ton limit in the ROP.

Six stacks are listed in association with FG-PAINTLINES in MI-ROP-N5814-2021. The stacks appeared to be consistent with the diameters specified in the ROP.

FG-METALLIC:

This flexible group consists of all metallic surface coating lines and all associated purge and clean-up operations at the stationary source. This includes any metallic surface coating line covered by this or any other general permit or any permit to install issued pursuant to Rule 201, and any metallic surface coating line exempt from the requirement to obtain a permit to install pursuant to Rule 287 and/or Rule 290. Previous FG ID: FG-SOURCE-S1

FGMETALLIC has a VOC emission limit of 30 tpy per a 12-month rolling basis. Since FG-PAINTLINES already covers the only coating operations at the facility, emissions calculations from FG-PAINTLINES show compliance with the limits specified by FG-METALLIC. See FG-PAINTLINES above for further information.

FG-MACTMMMM:

The facility submitted records showing the determination of the HAP content and density of the GEOMET coating used. The FG-MACTMMMM tab shows the compliance option chosen by the facility. They use compliant materials to meet the MACT requirement. The limit for coatings is less than 1.9 pounds of HAP per gallon of coating solids. Submitted calculations show the facility is at 1.71 pounds HAP per gallon of coating solids, which is in compliance with the MACT limit.

FG-GRINDERS:

This emission unit contains grinders 1 and 2 which were installed in 2018 under PTI 184-17. These were rolled into the most recent ROP. The facility submitted records showing the pressure drop is being checked daily on the DISA Baghouse checklist. Per the on-site inspection, the pressure drop is being monitored constantly while the grinders are running and are recorded by hand once per day.

FG-MACT5E_Existing

This emission unit consists of EU-GFMELTPOUR. The facility provided the records for FGGFFOUNDRY to show continuous compliance with the MACT emissions requirements. The baghouse is equipped with a bag leak detection device that continuously monitors the PM loading in the baghouse. The facility undergoes testing every 5 years to show compliance with the PM limit. Daily visible emissions readings are taken during first shift when the foundry is running.

FG-MACT5E_New

This emission unit consists of EU-DSMELTPOUR and EU-DSCOOLSHAK. The facility provided records for FGDSFOUNDRY to show compliance with the MACT emission limits. The CEMS tracks the Volatile Organic HAP (VOHAP) emissions as VOCs on a 3 -hour average. This is monitored continuously. The baghouse is equipped with a bag leak detection device that continuously monitors the PM loading in the baghouse. The facility undergoes testing every 5 years to show compliance with the PM limit. Daily visible emissions readings are taken during first shift when the foundry is running.

Compliance Determination:

Based on the observations made during the inspection and review of the required records and reports, Asama Coldwater Manufacturing, Inc. appears to be in compliance with MI-ROP-N5814, as well as all other State and Federal Air Pollution rules and regulations.

NAME Michael T. Cox DATE 8/7/2024 SUPERVISOR Monica Brothers