

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Aleris Recycling, Inc.		SRN : N5957
Location : 267 N. Fillmore Rd		District : Kalamazoo
		County : BRANCH
City : COLDWATER	State: MI	Zip Code : 49036
Compliance Status :		Compliance
Source Class : MAJOR	Staff : Rex Lane	
FCE Begin Date : 9/22/2013	FCE Completion Date :	9/22/2014
Comments :		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/04/2014	ROP Semi 1 Cert	Compliance	<p>Facility report was signed and dated by the responsible official. Report contained an addendum for the thermal chip dryer for time period 1/1/14 – 1/29/14. Facility did not operate thermal chip dryer in accordance with revised OMM plan (based on 7/9/13 performance test) that was submitted on 8/27/13. A violation notice was sent on 3/3/14 for the reportable incidents involving the thermal chip dryer. Incidents are considered resolved by Paragraph 9.A.3 of AQD administrative consent order No. 35-2014 that was signed on 6/4/14.</p> <p>Facility reported one incident where Torit # 2 (chip dryer) exceeded baghouse inlet temperature limit (403 degrees F) for approximately two hours due to PLC malfunction. Actual temperature was 405 degrees F during the reported incident and PLC function was then restored. The reported excess emissions were 0.049% of operating hours during the semi-annual reporting period. A violation notice will not be sent at this time. -RIL</p>

09/04/2014	ROP Semi 1 Cert	Compliance	<p>Facility report was signed and dated by the responsible official. Facility reported two incidences in April 2014 where trona was not being injected into the rotary furnace ductwork while processing dross. This was previously reported to the district office on 5/19/14. Facility has since installed a three lamp light system at each furnace. Furnace operator activates a blue light when the furnace will be charged with dross. A red light indicates that the trona feed system is off and a green light verifies that the trona feed system has been turned on. Furnace personnel have been instructed on the use of the three lamp system. This appears to be adequate corrective measure for the reported incidences.</p> <p>Facility reported six operating periods between 5/25/14 and 5/27/14 where the Rotary Furnace baghouse inlet temperature was exceeded. On May 25th, the carbon feeder motor failed and it was repaired on May 27, 2014. During the time period, the alarm temperature set point should have been lowered from 258 degrees F to 231 degrees F because the carbon injection system was inoperable. However, this did not occur due to operator error. Facility has put in place additional control checks that require the Supervisor to check the alarm setpoint and carbon feeder run status for each shift.</p> <p>Facility reported one incident on 6/14/14 where the Rotary Furnace baghouse inlet temperature was exceeded for approximately two hours. Facility initiated employee disciplinary action following this incident.</p> <p>Reported excess emissions for the Rotary Furnace Baghouse during the reporting period were 0.76% of process operating hours. A violation notice will not be sent at this time. -RIL</p>
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Activity Date	Activity Type	Compliance Status	Comments
09/04/2014	CO/CJ	Compliance	AQD administrative consent order No. 35-2014 was signed on 6/4/14. Facility reporting status update for compliance schedule in the order. -RIL
09/04/2014	CO/CJ	Compliance	AQD administrative consent order No. 35-2014 was signed on 6/4/14. Facility reporting status update for compliance schedule in the order. -RIL
09/04/2014	Excess Emissions (CEM)	Compliance	<p>Review of MACT Semi-Annual Excess Emissions/Summary Report (North Plant):</p> <p>Report contained an addendum for the thermal chip dryer for time period 1/1/14 – 1/29/14. Facility did not operate thermal chip dryer in accordance with revised OMM plan (based on 7/9/13 performance test) that was submitted on 8/27/13. A violation notice was sent on 3/3/14 for the reportable incidents involving the thermal chip dryer. Incidents are considered resolved by Paragraph 9.A.3 of AQD administrative consent order No. 35-2014 that was signed on 6/4/14. Facility reported one incident where Torit # 2 (chip dryer) exceeded baghouse inlet temperature limit (403 degrees F) for approximately two hours due to PLC malfunction. Actual temperature was 405 degrees F during the reported incident and PLC function was then restored. The reported excess emissions were 0.049% of operating hours during the semi-annual reporting period. A violation notice will not be sent at this time. Facility report was signed and dated by the responsible official. Report certifies that only unpainted chip feedstock was fed into the thermal chip dryer; molten metal level was maintained above the archway between the furnace charge well and hearth during reactive fluxing; and that only clean charge was process in the Group 2 furnace. -RIL</p>

09/04/2014	Excess Emissions (CEM)	Compliance	<p>Review of MACT Semi-annual Excess Emissions/Summary Report (South Plant):</p> <p>Facility reported two incidences in April 2014 where trona was not being injected into the rotary furnace ductwork while processing dross. This was previously reported to the district office on 5/19/14. Facility has since installed a three lamp light system at each furnace. Furnace operator activates a blue light when the furnace will be charged with dross. A red light indicates that the trona feed system is off and a green light verifies that the trona feed system has been turned on. Furnace personnel have been instructed on the use of the three lamp system. This appears to be adequate corrective measure for the reported incidences.</p> <p>Facility reported six operating periods between 5/25/14 and 5/27/14 where the Rotary Furnace baghouse inlet temperature was exceeded. On May 25th, the carbon feeder motor failed and it was repaired on May 27, 2014. During the time period, the alarm temperature set point should have been lowered from 258 degrees F to 231 degrees F because the carbon injection system was inoperable. However, this did not occur due to operator error. Facility has put in place additional control checks that require the Supervisor to check the alarm setpoint and carbon feeder run status for each shift.</p> <p>Facility reported one incident on 6/14/14 where the Rotary Furnace baghouse inlet temperature was exceeded for approximately two hours. Facility initiated employee disciplinary action following this incident.</p> <p>Reported excess emissions for the Rotary Furnace Baghouse during the reporting period were 0.76% of process operating hours. A violation notice will not be sent at this time.</p> <p>Facility report was signed and dated by the responsible official. Report certifies that the molten metal level was maintained above</p>
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09/04/2014	Excess Emissions (CEM)	Compliance	the archway between the reveratory furnace charge well and hearth during reactive fluxing. -RIL
08/28/2014	Self Initiated Inspection	Compliance	Self Initiated Inspection
05/30/2014	ROP Other		<p>Rotary Furnace Operation - Trona Injection while processing dross</p> <p>Aleris Recycling Inc. reported two incidents where trona was not injected into a rotary furnace ductwork while processing dross. The first incident occurred on the evening of 4/26/14 and lasted for approximately thirteen hours. Trona was being injected into Rotary Furnace # 1 that was processing scrap and not into Rotary Furnace # 2 that was processing dross. The second incident occurred on 4/28/14 and lasted less than five hours. The Rotary Furnaces were processing dross; however, trona was only being injected into the ductwork for Rotary Furnace # 2.</p> <p>Corrective action that has been taken by Aleris Recycling Inc. involved the installation of a three-lamp light bar by each furnace. When dross is slated to be processed in a furnace, the furnace operator will switch on a blue light. The remaining colored lamps, one green and one red, are wired into the trona feeder for each furnace. When the trona feeder is turned on, the green light shows and when the feeder is turned off, the green light goes off and the red light comes on. If the blue light is on while the green light is off, an audible alarm will sound. Aleris stated that training of all crews will be completed as of 5/20/14.</p> <p>A violation notice will not be sent at this time due to the brevity of the two incidents and due to the prompt corrective measures that were undertaken by the facility. - RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
05/29/2014	MAERS		<p>Review of 2013 MAERS Report:</p> <p>Staff submitted a request to Ms. Janine Grossheim that documentation be submitted to support use of stack test emission factors identified in the 2013 MAERS report. An excel spreadsheet was emailed to staff on 5/28/14 and staff attached it to the report. The spreadsheet data is based on emission testing conducted in 2008. Staff noted that some of the test emission factors in MAERS is actually based on more recent testing done in 2013 and will ask Ms. Grossheim to update their emission spreadsheet for reporting in 2014. Staff spot checked emission totals using throughput and stack test factor data and results were accurate. Staff made two changes to report as follows:</p> <p>EUALDROSS - mass balance emission factors for PM fractions were changed from 2.0E-3 to 2.4E-3; and</p> <p>EUALDRYER3 - facility reported 0 lbs. Pb emissions with a MAERS emission factor basis. Staff added 99% baghouse control factor and inserted the system calculated emission value (6.15 lbs.)</p> <p>-RIL</p>
04/22/2014	MACT (Part 63)	Non Compliance	<p>Revised OMM Plan Submittal - Aleris Recycling, Inc. (South Plant)</p> <p>Revised Operation, Maintenance and Monitoring (OMM) Plan (Revision # 12) submitted by Aleris Recycling, Inc. pursuant to 40 CFR 63,1510(b). Revision dross processing restriction under Appendix I. The AQD is not reviewing and/or approving the OMM plan revisions at this time (see attached 4/15/14 telephone note record for further details). - RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
04/15/2014	Telephone Notes	Non Compliance	FGROTFURN1/2 Engineering Test Results (February 2014) and OM & M Plan Submittal - Aleris Recycling
04/01/2014	ROP Annual Cert	Non Compliance	<p>Review of Annual Certification Report: 1/1/13 - 12/31/13</p> <p>Certification report contains an original signature by the facilities' plant manager. Facility reported two deviations where Torit # 2 baghouse inlet temperature on EUALDRYER3-S1 exceeded the allowable set point established during the 2013 performance test by one and two degrees F. The deviation was less than 0.5% over the temperature limit for less than 0.1% of the total operating hours during the reporting period for EUALDRYER3. A violation notice will not be sent for this deviation.</p> <p>The facility also reported that EUALFURN8 exceeded the permitted chlorine flux limit of 57.2 lbs. chlorine/ton feed charge by one pound for one batch due to a data entry error. Facility has been cited previously for this deviation and will be address in AQD consent order that is scheduled to go out for 30-day public comment period on 3/24/14. A violation notice will not be sent for this deviation since it will be addressed in the consent order.</p> <p>The excess emissions /summary report also included an addendum for EUALDRYER3 which identifies a significant number of afterburner 3-hour block operating temperature periods below the temperature set point established during a July 2013 performance test. The facility was sent a Violation Notice on 3/3/14 for this reported deviation. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
04/01/2014	ROP SEMI 2 CERT	Non Compliance	<p>Review of 2nd Semi-Annual Compliance Certification Report: 7/1/13 - 12/31/13</p> <p>Certification report contains an original signature by the facilities' plant manager. Facility reported two deviations where Torit # 2 baghouse inlet temperature on EUALDRYER3-S1 exceeded the allowable set point established during the 2013 performance test by one and two degrees F. The deviation was less than 0.5% over the temperature limit for less than 0.1% of the total operating hours during the reporting period for EUALDRYER3. A violation notice will not be sent for this deviation.</p> <p>The facility also reported that EUALFURN8 exceeded the permitted chlorine flux limit of 57.2 lbs. chlorine/ton feed charge by one pound for one batch due to a data entry error. Facility has been cited previously for this deviation and will be address in AQD consent order that is scheduled to go out for 30-day public comment period on 3/24/14. A violation notice will not be sent for this deviation since it will be addressed in the consent order.</p> <p>The excess emissions /summary report also included an addendum for EUALDRYER3 which identifies a significant number of afterburner 3-hour block operating temperature periods below the temperature set point established during a July 2013 performance test. The facility was sent a Violation Notice on 3/3/14 for this reported deviation. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
04/01/2014	ROP Annual Cert	Compliance	<p>Review of Annual ROP Certification and 2nd Semi-Annual ROP Certification Report; MACT Semi-Annual Excess Emissions/Summary Report</p> <p>Facility reported two parameter monitoring exceedances that occurred on 7/18/13 and 8/29/13. On 7/18/13, the facility exceeded the Reverb/Dryer baghouse inlet temperature limit by two degrees for 75 minutes due to failure of the dilution air damper. Correction was to repair the set point for damper to open. On 8/29/13, the facility exceeded the Rotary baghouse inlet temperature limit by 36 degrees for two hours due to a power outage causing PLC failure. Corrective action was to restore power to the PLC. A violation notice will not be sent at this time because exceedances were limited in duration and due either to damper malfunction or power outage. -RIL</p>
04/01/2014	ROP SEMI 2 CERT	Compliance	<p>Review of Annual ROP Certification and 2nd Semi-Annual ROP Certification Report; MACT Semi-Annual Excess Emissions/Summary Report</p> <p>Facility reported two parameter monitoring exceedances that occurred on 7/18/13 and 8/9/13. On 7/18/13, the facility exceeded the Reverb/Dryer baghouse inlet temperature limit by two degrees for 75 minutes due to failure of the dilution air damper. Correction was to repair the set point for damper to open. On 8/9/13, the facility exceeded the Rotary baghouse inlet temperature limit by 36 degrees for two hours due to a power outage causing PLC failure. Corrective action was to restore power to the PLC. A violation notice will not be sent at this time because exceedances were limited in duration and due either to damper malfunction or power outage. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
03/05/2014	ROP Annual Cert	Non Compliance	<p>Review of Annual Certification Report: 1/1/13 - 12/31/13</p> <p>Certification report contains an original signature by the facilities' plant manager. Facility reported two deviations where Torit # 2 baghouse inlet temperature on EUALDRYER3-S1 exceeded the allowable set point established during the 2013 performance test by one and two degrees F. The deviation was less than 0.5% over the temperature limit for less than 0.1% of the total operating hours during the reporting period for EUALDRYER3. A violation notice will not be sent for this deviation.</p> <p>The facility also reported that EUALFURN8 exceeded the permitted chlorine flux limit of 57.2 lbs. chlorine/ton feed charge by one pound for one batch due to a data entry error. Facility has been cited previously for this deviation and will be address in AQD consent order that is scheduled to go out for 30-day public comment period on 3/24/14. A violation notice will not be sent for this deviation since it will be addressed in the consent order.</p> <p>The excess emissions /summary report also included an addendum for EUALDRYER3 which identifies a significant number of afterburner 3-hour block operating temperature periods below the temperature set point established during a July 2013 performance test. The facility was sent a Violation Notice on 3/3/14 for this reported deviation. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
03/05/2014	ROP SEMI 2 CERT	Non Compliance	<p>Review of 2nd Semi-Annual Compliance Certification Report: 7/1/13 - 12/31/13</p> <p>Certification report contains an original signature by the facilities' plant manager. Facility reported two deviations where Torit # 2 baghouse inlet temperature on EUALDRYER3-S1 exceeded the allowable set point established during the 2013 performance test by one and two degrees F. The deviation was less than 0.5% over the temperature limit for less than 0.1% of the total operating hours during the reporting period for EUALDRYER3. A violation notice will not be sent for this deviation.</p> <p>The facility also reported that EUALFURN8 exceeded the permitted chlorine flux limit of 57.2 lbs. chlorine/ton feed charge by one pound for one batch due to a data entry error. Facility has been cited previously for this deviation and will be address in AQD consent order that is scheduled to go out for 30-day public comment period on 3/24/14. A violation notice will not be sent for this deviation since it will be addressed in the consent order.</p> <p>The excess emissions /summary report also included an addendum for EUALDRYER3 which identifies a significant number of afterburner 3-hour block operating temperature periods below the temperature set point established during a July 2013 performance test. The facility was sent a Violation Notice on 3/3/14 for this reported deviation. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
03/05/2014	Excess Emissions (CEM)	Non Compliance	<p>Review of MACT Excess Emissions/Summary Report: 7/1/13 - 12/31/13</p> <p>Facility reported two deviations where Torit # 2 baghouse inlet temperature on EUALDRYER3-S1 exceeded the allowable set point established during the 2013 performance test by one and two degrees F. The deviation was less than 0.5% over the temperature limit for less than 0.1% of the total operating hours during the reporting period for EUALDRYER3. A violation notice will not be sent for this deviation.</p> <p>The facility also reported that EUALFURN8 exceeded the permitted chlorine flux limit of 57.2 lbs. chlorine/ton feed charge by one pound for one batch due to a data entry error. Facility has been cited previously for this deviation and will be address in AQD consent order that is scheduled to go out for 30-day public comment period on 3/24/14. A violation notice will not be sent for this deviation since it will be addressed in the consent order.</p> <p>The excess emissions /summary report also included an addendum for EUALDRYER3 which identifies a significant number of afterburner 3-hour block operating temperature periods below the temperature set point established during a July 2013 performance test. The facility was sent a Violation Notice on 3/3/14 for this reported deviation. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
02/24/2014	ROP SEMI 2 CERT	Compliance	<p>Review of Annual ROP Certification and 2nd Semi-Annual ROP Certification Report; MACT Semi-Annual Excess Emissions/Summary Report</p> <p>Facility reported two parameter monitoring exceedances that occurred on 7/18/13 and 8/29/13. On 7/18/13, the facility exceeded the Reverb/Dryer baghouse inlet temperature limit by two degrees for 75 minutes due to failure of the dilution air damper. Correction was to repair the set point for damper to open. On 8/29/13, the facility exceeded the Rotary baghouse inlet temperature limit by 36 degrees for two hours due to a power outage causing PLC failure. Corrective action was to restore power to the PLC. A violation notice will not be sent at this time because exceedances were limited in duration and due either to damper malfunction or power outage. -RIL</p>
02/24/2014	ROP Annual Cert	Compliance	<p>Review of Annual ROP Certification and 2nd Semi-Annual ROP Certification Report; MACT Semi-Annual Excess Emissions/Summary Report</p> <p>Facility reported two parameter monitoring exceedances that occurred on 7/18/13 and 8/29/13. On 7/18/13, the facility exceeded the Reverb/Dryer baghouse inlet temperature limit by two degrees for 75 minutes due to failure of the dilution air damper. Correction was to repair the set point for damper to open. On 8/29/13, the facility exceeded the Rotary baghouse inlet temperature limit by 36 degrees for two hours due to a power outage causing PLC failure. Corrective action was to restore power to the PLC. A violation notice will not be sent at this time because exceedances were limited in duration and due either to damper malfunction or power outage. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
02/24/2014	MACT (Part 63)	Compliance	<p>Review of Annual ROP Certification and 2nd Semi-Annual ROP Certification Report; MACT Semi-Annual Excess Emissions/Summary Report</p> <p>Facility reported two parameter monitoring exceedances that occurred on 7/18/13 and 8/29/13. On 7/18/13, the facility exceeded the Reverb/Dryer baghouse inlet temperature limit by two degrees for 75 minutes due to failure of the dilution air damper. Correction was to repair the set point for damper to open. On 8/29/13, the facility exceeded the Rotary baghouse inlet temperature limit by 36 degrees for two hours due to a power outage causing PLC failure. Corrective action was to restore power to the PLC. A violation notice will not be sent at this time because exceedances were limited in duration and due either to damper malfunction or power outage. -RIL</p>
02/10/2014	Stack Test Observation	Pending	Rotary Furnaces: PM10 and PM2.5 Emission Testing; 2/10/14 through 2/18/14

Activity Date	Activity Type	Compliance Status	Comments
12/12/2013	MACT (Part 63)	Non Compliance	<p>Revised OM&M Plan Submitted for Aleris Specification Alloys, Inc.</p> <p>Facility submitted revision # 9 to their current O&M plan to add September 2013 test results for furnaces # 1, # 7, and # 8 and associated stack test production data to Appendix H. At this time, the OM&M plan revision is not being reviewed or approved by district staff for the following reasons:</p> <ul style="list-style-type: none"> • Although the September 2013 test results demonstrate compliance with 40 CFR Part 63, Subpart RRR emission limitations, the facility has not demonstrated compliance with PM10 emission limits under ROP MI-ROP-N5957-2012a for FGALFURN1/2/7/8-S1: SVALFURN7-S1 and SVALFURN8-S1 (Furnace Hearth Flues for Furnaces # 7 and # 8); • Air Quality Division is in negotiations with facility to enter into an administrative consent order to address emission violations at both Aleris Recycling Inc. and Aleris Specification Alloys, Inc.; <p>-RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
12/03/2013	Stack Test	Non Compliance	<p>September 2013 Test: Furnace 7 and 8 (Baghouse # 1); Associated Furnace Flue Stacks</p> <p>Staff reviewed Tables 2-1 and 2-2 in the test report for compliance with 40 CFR Part 63, Subpart RRR and MI-ROP-N5957-2012a. Table 2-1 test results indicate compliance with associated emission limits under 40 CFR Part 63, Subpart RRR. Table 2-2 test results for EUALFURN7 and EUALFURN8 indicate non-compliance with hydrogen chloride (HCL) limit under MI-ROP-N5957-2012a. However, facility will not be cited for HCL due to issuance of PTI No. 126-13 on 11/18/13 which increased the permit limit to above the tested value. Table 2-2 test results for SVALFURN7 and SVALFURN8 indicate non-compliance with PM10 emission limits in MI-ROP-N5957-2012a. A violation notice will be sent to the facility for non-compliance with PM10 emission limits for SVALFURN7 and SVALFURN8. - RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
10/15/2013	MACT (Part 63)	Non Compliance	<p>Review of MACT Subpart RRR Excess Emission/Summary Report - Aleris Specification Alloys</p> <p>The facility listed the following deviations in their report submittal:</p> <p>4/19/13 – Exceeded 57.2 lb Cl₂/ton feed charge MACT limit in Furnace 8 in one batch [64.25 lb CL₂/ton feed charge]. Facility was previously cited on 5/4/12 for the same violation/furnace;</p> <p>5/29/13 and 6/23/13 – 3-hour rolling inlet temperature MACT limit in Baghouse (BH) # 1 and # 2 was exceeded due to duct inlet blockage and/or damage to furnace doors. These events ranged between 1 and 4.5 hours in length/each and the temperature exceedance did not exceed the limit by more than 4 degrees F. This represents 0.3% of the operating time for BH # 1 and 0.1% for BH # 2 during the reporting period.</p> <p>Violation notice will be sent to the facility for the repeat chlorine feed exceedance in furnace # 8. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
10/15/2013	MACT (Part 63)	Non Compliance	<p>Review of MACT Subpart RRR Excess Emission/Summary Report - Aleris Recycling Inc.</p> <p>The facility listed the following deviations in their report submittal:</p> <p>2/22/13 - 3-hour rolling inlet temperature MACT limit (231 degrees F) in Rotary Furnace BH was exceeded (232 degrees F) for about two hours due to poor material quality;</p> <p>5/1/13 - 3-hour rolling inlet temperature MACT limit (231 degrees F) in Rotary Furnace BH was exceeded (236 degrees F) for about two hours due to air damper malfunction;</p> <p>These Rotary Furnace BH exceedances were 0.1% of total operating time during the reporting period.</p> <p>A violation notice will not be sent for deviations reported in this excess emissions/summary report. -RIL</p>
10/15/2013	ROP Semi 1 Cert	Non Compliance	<p>Review of Semi-Annual Compliance Certification and Deviation Report - Aleris Specification Alloys</p> <p>Reports were received on 9/12/13 and contained an original signature by the facility's responsible official. Staff noted that box # 1 was checked (i.e. no deviations) and deviations were listed in their deviation report. On 9/27/13, staff left a voice mail message with Ms. Janine Grossheim and revised semi-annual ROP certification forms were received on 10/7/13. A violation notice is being sent to the facility for a recurring chlorine/ton feed charge exceedance in furnace # 8. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
10/15/2013	ROP Semi 1 Cert	Non Compliance	<p>Review of Semi-Annual Compliance Certification and Deviation Report - Aleris Recycling, Inc.</p> <p>Reports were received on 9/12/13 and contained an original signature by the facility's responsible official. Staff noted that box # 1 was checked (i.e. no deviations) and deviations were listed in their deviation report. On 9/27/13, staff left a voice mail message with Ms. Janine Grossheim and revised semi-annual ROP certification forms were received on 10/7/13. Facility reported two 3-hour rolling inlet temperature exceedances during the reporting period for the rotary furnace baghouse. These rotary furnace baghouse exceedances were 0.1% of total operating time during the reporting period. A violation notice will not be sent for this certification and deviation report. Facility has been referred to the AQD Enforcement Unit for other MACT and NSR/ROP violations. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
10/07/2013	MACT (Part 63)	Pending	<p>Revised OMM Plan Submittal - Aleris Specification Alloys, Inc. (North Plant)</p> <p>Revised Operation, Maintenance and Monitoring (OMM) Plan submitted by Aleris Specification Alloys, Inc. pursuant to 40 CFR 63,1510(b). Revision adds the operational limits for EUALDRYER3-S1, EUALSHREDDER-S1 and EUALFURN1-S1 based on 40 CFR Part 63, Subpart RRR testing conducted between 7/9/13 and 7/13/13. Test results indicate compliance with MACT and NSR emission limits for EUALDRYER3-S1 and EUALSHREDDER and with MACT and some NSR emission limits for EUALFURN1-S1. The test report for EUALFURN1-S1 averages the PM-10 emission rates from Runs 1, 2, 4, 5 and 6 together to show compliance (Run 3 dropped due to process malfunction). Using the results from Runs 4, 5 and 6 only results in non-compliance with PM-10 limit for SVALFURN1-S1. Awaiting final test report memo from AQD-TPU for determination of compliance status. -RIL</p>
09/26/2013	Stack Test	Pending	<p>North Plant NESHAP Compliance Test - EUALSHREDDER, EUALDRYER3, EUALFURN1/2, SVALFURN1/2</p> <p>Test report indicates compliance with all NESHAP pollutants (PM, D/F, THC and HCL) and permit limitations (PM10, HCL, THC and CL2). However, Baghouse # 2 emission rates for PM-10 and HCL and for SVALFURN1 for PM-10 ranged between 92 - 97% of their allowable emission rate. Since the margin of compliance is very thin, any testing or calculation error in the test report could throw the results into non-compliance. Staff has submitted a request to AQD-Technical Programs Unit to review the identified results. -RIL</p>

Name: RIL

Date: 9/22/14

Supervisor: MD 9/22/2014