

Manila
Cody —

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Real Alloy 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 : 4/12/2017	FCE Completion Date : 4/12/2018
Comments : FCE Report	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
04/12/2018	CO/CJ	Compliance	Semi-annual Certification Report for AQD Consent Order No. 35-2014 - Real Alloy Specification
04/12/2018	CO/CJ	Compliance	Semi-annual Certification Report for AQD Consent Order No. 35-2014 - Real Alloy Recycling

Activity Date	Activity Type	Compliance Status	Comments
04/12/2018	ROP SEMI 2 CERT	Compliance	<p>Second Semi-annual Compliance Certification Report - Real Alloy Specification (RAS)</p> <p>Report contains an original dated signature by the facility's responsible official. RAS reported one deviation from ROP terms and conditions during the time-period 7/1/17 through 12/31/17. The RAS deviation reported was for exceeding the permitted flux limit of 56.0 pounds chlorine/ton feed charge on 12/16/17 for EUALFURN8. The actual flux rate was 57.9 pounds chlorine/ton feed charge which is 103.4% of the limit that was caused by a data entry error during shift change. Corrective action taken was to revise production heat sheet so data is not transferred to another heat sheet record due to a shift change. Staff has previously cited RAS for similar flux rate exceedances. Facility response to the citation has been that the calculated HCL emissions with the higher flux rate does not exceed HCL emission limit based on stack test data. -RIL</p>
04/12/2018	ROP Annual Cert	Compliance	<p>ROP Annual Certification Report - Real Alloy Specification</p> <p>Report contains an original dated signature by the facility's responsible official. See semi-annual certification report for further information on reported deviation. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
04/12/2018	ROP SEMI 2 CERT	Compliance	<p>Second Semi-annual Compliance Certification Report - Real Alloy Recycling (RAR)</p> <p>Report contains an original dated signature by the facility's responsible official. RAR reported one deviation from ROP terms and conditions during the time-period 7/1/17 through 12/31/17. The RAR deviation reported was for exceeding the rotary baghouse inlet temperature limit of 231 degrees F on 9/24/17. The actual inlet temperature was 234 degrees F which is 101.3% of the limit or 0.04% of the operating time during the reporting period. Staff has previously cited RAR for similar baghouse inlet temperature exceedances. Corrective measures taken by the facility to reduce baghouse inlet temperature were to slow furnace feed rate, check air damper function and staggering charging of material between the two rotary furnaces. -RIL</p>
04/12/2018	ROP Annual Cert	Compliance	<p>ROP Annual Certification Report - Real Alloy Recycling</p> <p>Report contains an original dated signature by the facility's responsible official. See semi-annual certification report for further information on reported deviation. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
04/12/2018	Excess Emissions (CEM)	Compliance	<p>NESHAP Semi-annual Excess Emissions/Summary Report - Real Alloy Specification (RAS)</p> <p>Report contains an original dated signature by the facility's responsible official. RAS reported one deviation during the time-period 7/1/17 through 12/31/17. The RAS deviation reported was for exceeding the permitted flux limit of 56.0 pounds chlorine/ton feed charge on 12/16/17 for EUALFURN8. The actual flux rate was 57.9 pounds chlorine/ton feed charge which is 103.4% of the limit. Staff has previously cited RAS for similar flux rate exceedances. Facility response to the citation has been that the calculated HCL emissions with the higher flux rate does not exceed HCL emission limit based on stack test data.</p>
04/12/2018	Excess Emissions (CEM)	Compliance	<p>NESHAP Semi-annual Excess Emissions/Summary Report - Real Alloy Recycling (RAR)</p> <p>Report contains an original dated signature by the facility's responsible official. RAR reported one deviation during the time-period 7/1/17 through 12/31/17. The RAR deviation reported was for exceeding the rotary baghouse inlet temperature limit of 231 degrees F on 9/24/17. The actual inlet temperature was 234 degrees F which is 101.3% of the limit or 0.04% of the operating time during the reporting period. Staff has previously cited RAR for similar baghouse inlet temperature exceedances. Corrective measures taken by the facility to reduce baghouse inlet temperature were to slow furnace feed rate, check air damper function and staggering charging of material between the two rotary furnaces.</p>
04/05/2018	Stack Test Observation		South Plant Reverberatory Furnace Stack Test
03/28/2018	Self Initiated Inspection	Compliance	Self Initiated Inspection

Activity Date	Activity Type	Compliance Status	Comments
02/23/2018	Meeting Notes	Compliance	Upcoming Emission Testing and Draft ROP Renewal Permit Comments
12/20/2017	MACT (Part 63)		Revised OM & M Plan - Real Alloy Coldwater South Plant Revised OMM Plan (14th revision) submitted by Real Alloy pursuant to 40 CFR 63.1510(b). Revision updates incorporate changes associated with Rotary Furnace stack testing conducted in September and October 2017 and associated updates to Appendix C Operating Limits and Appendix H Stack Test Production Summary. -RIL
12/04/2017	Stack Test	Compliance	South Plant - Rotary Furnace Test Test was done to demonstrate compliance with emission limitations for FGIMROTFURN1/2 in the facility's ROP MI-ROP-N5957-2012e, PTI No. 216-16 and the Secondary Aluminum MACT, 40 CFR Part 63, Subpart RRR. The rotary furnaces were tested under two different operating conditions, processing dross for three test runs (Parameters: PM, PM10, PM2.5, HCL) and processing scrap for three test runs (Parameters: Dioxins/Furans, THC). Test report indicated compliance with all parameter emission limits except for PM and PM2.5. Prior to test run # 3, facility maintenance discovered four bags in baghouse module 2-1 were not properly affixed to their support cages and this issue was corrected prior to the start of Test Run 3, however, the three test run average still exceeded the emission limit. The facility retested the rotary furnaces on 10/12/17 and followup test demonstrated compliance with PM, PM10 and PM2.5 emission limits. -RIL
12/04/2017	Sample Results Review	Compliance	Rotary Furnace Tests: September and October 2017

Activity Date	Activity Type	Compliance Status	Comments
09/25/2017	Excess Emissions (CEM)	Non Compliance	<p>MACT Subpart RRR: Semi-annual Excess Emissions/Summary Report</p> <p>Attached ROP certification report contains an original dated signature by the facility's responsible official. The facility reports three incidents where the reveratory furnace baghouse inlet temperature limit was exceeded due to either thermocouple failure or compressed air leakage. The facility reported two incidents where the 8-hour lime checks were not completed due to lack of personnel. The 8-hour lime check deviations are recurring thus staff will be sending a violation notice for this reported deviation. -RIL</p>
09/25/2017	Excess Emissions (CEM)	Non Compliance	<p>MACT Subpart RRR: Semi-annual Excess Emissions/Summary Report</p> <p>Attached ROP certification report contains an original dated signature by the facility's responsible official. The Excess Emissions/Summary report identifies one excess emissions event where Furnace 8 exceeded the permitted flux limit of 56.0 lbs/ton feed charge due to data entry error by the operator. Facility will be sent a VN for this recurring deviation. -RIL</p>
09/25/2017	CO/CJ	Non Compliance	<p>AQD Consent Order No. 35-2014</p> <p>ROP semi-annual compliance certification reports were received for both ROP Section No. 1 and 2 that have original dated signatures by the respective responsible official. Report identifies a third exceedance (5/17/17) of the permitted flux rate in lbs./ton feed charge from EUALFURN8-S1. Staff will be sending a violation notice for the recurring deviation. Field personnel will have a follow-up discussion with Enforcement Unit upon receipt of the VN response and determine whether to pursue stipulated penalty for Paragraph 9.A.2 under Paragraph 13 of the order. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
09/25/2017	ROP Semi 1 Cert	Non Compliance	Facility will be sent a violation notice. See Excess Emissions Report for further details.
09/25/2017	ROP Semi 1 Cert	Non Compliance	Facility will be sent a violation notice. See Excess Emissions Report for further details.
09/12/2017	Stack Test Observation		FGIMROTFURN1/2-S2 Emission Test: 9/12/17 - 9/14/17
08/17/2017	Telephone Notes		North Plant (Draft PTI No. 109-16A) & South Plant Rotary Furnace Test (Sept. 2017)

Name: RIL

Date: 4/12/18

Supervisor: MR 4/16/2018

