

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

N676538563

FACILITY: Real Alloy Specification, Inc.		SRN / ID: N6765
LOCATION: 2600 Nodular Drive, SAGINAW		DISTRICT: Saginaw Bay
CITY: SAGINAW		COUNTY: SAGINAW
CONTACT: Brady Myers , Regional Health, Safety & Environmental Manager		ACTIVITY DATE: 02/06/2017
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection to determine compliance with PTI 58-07B. Facility was in compliance with PTI at the time of the inspection.		
RESOLVED COMPLAINTS:		

I (glm) conducted a scheduled inspection at Real Alloy Specification, Saginaw facility. Mr. Brad Myers, Regional H, S & E Manager, & Mr. Kevin Kusowki, operator, participated in the inspection. The facility was built as an aluminum processing operation that supplied molten aluminum to the General Motors Powertrain Plant located approximately two miles from Aleris. All but a screening/shaker operation has been idle since December 23, 2013.

At the time of the inspection the facility was in compliance with PTI 5-07B and the applicable air quality regulations.

The facility is categorized as an area source with all processes covered under opt out permit No. 58-07B issued on April 3, 2008. The facility is subject to the area source requirements of 40 CFR 63 Subpart RRR, Secondary Aluminum Production NESHAP. The three reverberatory furnaces are currently the only affected sources under the NESHAP. In 2009 the facility reached agreement with EPA on violations cited in a Consent Decree that required improvements to emission capture. The Consent Decree was terminated on May 17, 2011.

The opt-out source was permitted based on the primary sources of air emissions from a rotary hammer crusher, three (3) reverberatory aluminum melting furnaces, crucible stations and dross handling. The facility was designed & operated to melt clean sows/ingots along with returns from GM in the three reverberatory furnaces. The molten aluminum was brought to spec and tapped into transport crucibles that carried the molten aluminum to GM via semi tractor-trailer.

The facility previously had over 30 employees and operated up to (3) 8-hour shifts. Real Alloy Specification is maintaining the facility in a condition that would allow operations to occur with minimal start up required.

Since the majority of the facility is idle, EUDROSS and FGFACILITY were the only emission units inspected to determine compliance.

**EUDROSS – Dross Handling and Load out- Compliant**

Handling and load out of dross generated by the reverberatory furnaces. Controlled by 60,000 CFM. The 12 month rolling average for 2015 was 974.8 tons of charge.

EUDROSS restricts the emission of PM and PM-10. Compliance with the emission limits is demonstrated through proper operation of the required baghouse control equipped with a bag leak detection system. The facility provided baghouse operating and maintenance records during the inspection. See attached.

The screening/shaker unit was not operating during the inspection. We did view the baghouse and discussed preventative maintenance requirements.

**FGFACILITY- Compliant**

Flex group that establishes facility-wide opt out limits and incorporates Subpart RRR requirements.

Emission limits for CO, NOx and PM-10 are 66.12 TPY, 40.01 TPY, and 89.97 TPY. Reported 2015 tons of emissions were 0 for CO, 0 for NOx, and 0.01 for all PM.. The PM-10 limit is an opt-out for Title V.

Compliance with CO and NOx emissions is determined based upon fuel usage for FGFACILITY. Compliance with PM-10 emissions is determined based upon stack testing for FG001, EUCRSR and Flue 1, 2, and 3. PM-10 emissions from FG002 are based upon fuel usage. These units have not operated since December 23, 2013.

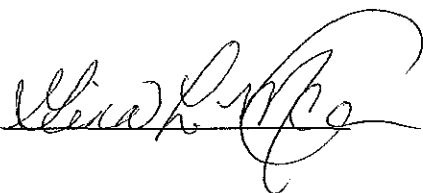
**40 CFR PART 63 SUBPART RRR**

The facility is subject to Subpart RRR as an area source, with the affected emission units being the three aluminum reverberatory furnaces. As an area source the furnaces are subject to the dioxin/furan limits for a Group 1 furnace as well as the associated monitoring requirements. The facility tested and demonstrated compliance with the D/F limit in September 2007.

Baghouses are the controls used at this facility. Furnace baghouses employ lime injection for dioxin/furan control under the NESHAP. All baghouses are equipped with broken bag detectors, monitored through redundant process control systems and recorded on strip charts. Baghouse alarms and corrective action are recorded. The site has an automated PM schedule for the baghouses.

Based upon the information and observations made during this inspection, the facility is in compliance with applicable air quality rules and regulations, including permit to install No. 58-07B and Subpart RRR, the Secondary Aluminum Production NESHAP.

At the time of the inspection, Mr. Myers asked if the facility is still required to report to MAERS and subsequently pay fees. I spoke with Mr. Dennis McGeen from the MAERS unit and it was determined since the facility is still subject to Subpart RRR then the facility will still be included in MAERS. If the facility chooses to remove the subject equipment and void or modify the existing permit, then the facility can be removed from MAERS. See attached email sent to Mr. Myers.

NAME 

DATE 2/14/17

SUPERVISOR 