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

N768849932

FACILITY: Dicastal North America, Inc.		**SRN / ID:** N7688
LOCATION: 1 Dicastal Dr., GREENVILLE		**DISTRICT:** Grand Rapids
CITY: GREENVILLE		**COUNTY:** MONTCALM
CONTACT: Daniel Schwab , EHS Manager		**ACTIVITY DATE:** 08/16/2019
STAFF: Eric Grinstern	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Unannounced Inspection		
RESOLVED COMPLAINTS:		

FACILITY DESCRIPTION

Dicastal North America Inc. is located in the city of Greenville, in Montcalm County. The facility is a low pressure permanent mold aluminum alloy wheel manufacturing operation. All process associated with the alloy wheel manufacturing process are conducted onsite, including melting, casting, heat treating, finishing and coating.

REGULATORY ANALYSIS

The stationary source has as an opt-out permit (No. 78-15E) that covers all permitted processes. PTI No. 78-15E was issued in April 2019 to allow for changing control for the chip dryer from a thermal oxidizer to a baghouse. The facility has one chip dryer (EU-Dryer) that is subject to the area source requirements of Subpart RRR, Secondary Aluminum Production NESHAP. A natural gas boiler (11.2 MMBtu/hr), associated with the paint shop (EU-PaintShopBlr) is subject to NSPS Dc. The facility also has a 1,500 kW diesel emergency generator (EU-Gen1) that is subject to the RICE MACT, Subpart ZZZZ and NSPS subpart IIII.

COMPLIANCE EVALUATION

At the facility, AQD staff, consisting of Eric Grinstern and Scott Evans, met with Daniel Schwab, Environmental Health & Safety Specialist.

Below is an evaluation of compliance based on PTI No. 78-15E.

EU-Chip Dryer

DESCRIPTION: Machining fluid removal system and thermal chip dryer. A spinner uses centrifugal force to mechanically remove excess emulsion fluid from the chips, followed by a thermal chip dryer for volatilizing remaining emulsion on the chips using natural gas combustion (6.0 MMBtu/hr) for heat. Control consists of a cyclone followed by a baghouse. Emission were re-routed from the thermal oxidizer to a baghouse on July 8, 2019.

EMISSION LIMITS

The permit limits the emission of PM, PM10, PM2.5, VOC and dioxins and furans. Particulate matter is limited on a pph basis, while VOC is limited on a tpy basis. Dioxins and furans are limited under Subpart RRR on a grain per ton of charge basis.

Testing was conducted for dioxin/furan in May 2017 and April 2018, at which time compliance was demonstrated. The facility retested to account for increased chip throughput associated with the installation of a second melt line. Testing was conducted in May 2018, for PM, PM10, PM2.5 and VOC, at which time it was determined that the emission unit was exceeding the permitted PM, PM10, and PM2.5 emission limits. Additionally, due to the low VOC inlet concentrations to the thermal oxidizer, the minimum destruction efficiency of 95% was not met. The facility had previously informed AQD that they had conducted an engineering study that showed they would not be able to meet the

PM limits, which resulted in the installation of baghouses control.

A Violation Notice was issued for the documented emission limit exceedances and resolved via a consent order.

Under the consent order and subsequent PTI No. 78-15E, the facility was required to retest the chip dryer to demonstrate compliance with baghouse control. The facility has informed AQD that they are experiencing issues with opacity from the baghouse and need to reconnect the thermal oxidizer (TO) prior to the baghouse. Due to the time needed to reconnect the TO, the facility will be requesting an extension to conduct testing.

MATERIAL LIMITS

The chip dryer is limited to processing 3.31 tons of chips per hour (daily average) and 20,834 tpy on a 12-month rolling time period.

Compliance with the material throughput limits is determined through the permit and Subpart RRR requirement that the chip dryer be equipped with a device to measure and record the weight of chips fed to the dryer. The facility is also required to monitor and record the weight of chips fed to the dryer on a daily basis, keep a log of the hourly average throughput rate of material charged and keep monthly and 12-month rolling records of the total weight of charge materials to the dryer.

The conveyor system is equipped with a feed rate scale that shows tons per hour and a recorder that tracks total chips feed to the dryer. The observed rate during the inspection was set at 3.0 tons per hour. The facility supplied throughput records, as requested, for the previous 8 days.. The records show a peak hourly throughput rate of 2.45 tons per hour, based on a daily average. The facility supplied throughput records documenting 12,690 tons of chips processed for the 12-month period ending in July 2019. Both the hourly and tpy rates are in compliance with the permitted limits.

Feedstock to the chip dryer is limited to unpainted/uncoated aluminum chips. Feedstock to the chip dryer is conveyed directly from the in-plant wheel finishing operations. If more chips are generated than can be fed to the chip furnaces or stored in the chip silo, they are conveyed to a semi-trailer for storage and later use. During the inspection only unpainted/uncoated chips were observed to be fed to the chip dryer.

PROCESS/OPERATIONAL RESTRICTIONS

Requires that the emissions from the chip dryer be controlled with a baghouse equipped with a bag leak detection system.

Emissions are controlled by a baghouse equipped with a bag leak detection system. Review of supplied bag leak detection records for the past 8 days showed a 3-hour average high of 0.01. On the day of the inspection all of the readings were 0.

The 3-hour block average inlet temperature of the baghouse is required to be maintained at or below the average temperature established during performance testing, plus 25 degrees. This is a state-only requirement, since Subpart RRR does contain requirements for a baghouse controlling emissions from a thermal chip dryer.
The facility has not conducted performance testing yet, and therefore had not established a baseline temperature. The facility supplied requested baghouse inlet temperature records for the previous 8 days that showed an average baghouse inlet temperature of 90 degrees C.

DESIGN/EQUIPMENT PARAMETERS

Requires a device to measure and record the weight of feed to the chip dryer. The device has been

installed as previously discussed.

Subpart RRR requires that the scale be calibrated no less than every 6 months. During the last inspection, review of the certification showed calibrations were being conducted every 6 months.

Requires that the capture and control equipment meet the requirements of Subpart RRR. The facility is required to certify compliance in the Notification of Compliance Status Report. Observation of the capture and control system during the inspection showed an almost closed system from which no fugitive emissions were observed.

After re-routing to baghouse control, the facility is required to monitor the baghouse pressure drop on a continuous basis and maintain daily records of the pressure drop. The facility supplied daily baghouse pressure drop records for the previous 8 days. Review of the records showed a pressure drop range between 3.5 and 4.1 inches.

TESTING/SAMPLING

Retesting to verify compliance with the permitted PM, PM10, PM2.5, VOC and dioxin/furan (D/F) emissions is required within 90 days of re-routing emissions to the baghouse. The facility will likely submit a request for an extension to conduct testing to allow for the reconnection of the thermal oxidizer.

MONITORING/RECORDKEEPING

The facility is required to maintain records of the following: baghouse inlet temperature, chip dryer feed weight per operating cycle, daily record of average hourly throughput rate and 12-month rolling total charge to the dryer.

The facility is maintaining the required records as previously detailed in this report.

OBSERVATIONS

During the on-site inspection, observation of the baghouse and stack associated with the chip dryer showed no visible emissions. Upon completion of the on-site inspection, staff remained in the vicinity of the facility. While on Fitzner Road, which forms the eastern boundary of the facility, staff observed white opacity from the chip dryer baghouse stack. Opacity from the stack was continuous so staff located an appropriate observation location along Fitzner Road and conducted Method 9 observations (Attached). A six-minute average opacity of 36.67% was documented, which is greater than the 20% allowed by General Condition 11 of the permit and Rule 301.

EU-MoldPreHeat

DESCRIPTION: 1.86 MMBtu/hr natural gas combustion furnace for preheating the die casting molds. Furnace has 3 burners each rated at 180 kW. Exhaust gases are vented with EU-MoldCoatFurn.

During the inspection the mold preheat furnace was observed but was not operating at the time.

The mold preheat furnace is restricted to burn only pipeline quality natural gas and to not exceed 180 kilowatts per burner.

No other gas source except natural gas was observed during the inspection. The facility records provided as part of a previous inspection confirm compliance with the 180 kW heat input limit for each of the three burners.

EU-MoldCoatFurn

DESCRIPTION: 1.24 MMBtu/hr two-chamber natural gas combustion furnace for drying the water-based mold coating. Furnace has 2 burners each rated at 180 kW. Furnace includes two rail car bays. Exhaust gases are vented with EU-MoldPreHeat.

During the inspection the mold coat furnace was observed but was not operating at the time.

The mold coat furnace is restricted to burn only pipeline quality natural gas and to not exceed 180 kilowatts per burner.

No other gas source except natural gas was observed during the inspection. The facility records provided as part of the previous inspection confirm compliance with the 180 kW heat input limit for each of the two burners.

EU-MoldSonicClean

DESCRIPTION: Mold sonic cleaner baths consisting of alkaline cleaner, rinse, followed by rust inhibitor used to clean the molds before casting. Vapors from the baths are vented externally out the wall.

MONITORING/RECORDKEEPING

Requires that the facility maintain a current list, from the manufacture, of the chemical composition of every material used in EU-MoldSonicClean. The facility previously provided copies of the SDSs for the cleaners used in the process.

EU-DieCasting

DESCRIPTION: 28 low-pressure die casting machines used to form the shape of the aluminum wheels. There is no dedicated exhaust system for the die casting machines. Molten aluminum is transported to the electric holding furnaces of the die casting machines. A solid fluxing agent is used in the die casting machines' holding furnaces for removing impurities in the molten aluminum prior to the aluminum being injected into the molds. A cooling tower is used to cool process water. Process water is used to cool the molds in the die casting machines.

EMISSION LIMITS

The emission of PM from the cooling tower is limited to 0.005% drift loss. Compliance with the emission limit is verifiable via testing, which has not been required.

MATERIAL LIMITS/ RECORDKEEPING

The permit limits the use of mold release and flux in EU-DieCasting. Compliance is based on the requirement that the facility maintains records of the daily flux usage as well as the monthly and 12-month rolling usage of flux and mold release.

Flux usage is limited to 80lb/ 8-hours and 92,594 lb./ year limit. Review of the previous 8 days of flux records showed a daily usage that topped 224 pounds. Review of 12-month rolling total usage records showed a total of 50,145 pounds used.

The facility is limited to using 11 tons of mold release on a 12-month rolling time period.
The facility provided records documenting compliance, with a 12-month rolling time period usage amount of 8.88 tons for the time period ending in July 2019.

MONITORING/RECORDKEEPING

In addition to records of flux and mold release usage, the facility is required to maintain records of HCL emissions. HCL emissions are associated with the use of flux in EU-DieCasting. The facility provided monthly and 12-month rolling HCL emissions. EU-DieCasting does not contain a limit for HCL.

EU-SandBlast

DESCRIPTION: Sand Blasting Machine used to clean the molds following casting. The emissions from the sand blasting machine are controlled by a fabric filter.

EMISSION LIMITS

The emission of PM is limited to 0.007 grains per dscf of gas. Compliance with the emission limit is based on proper operation of the fabric filter. To assure proper operation of the fabric filter unit the facility is required to monitor and record the pressure drop once per day.

The facility provided a copy of the pressure drop readings for the previous 30 days. All readings were below 4.0 inches. The facility has established an upper limit of 6 inches, (above 6 inches they are to notify Maintenance.

Observation of the baghouse during the inspection showed collected material on the ground around the unit. There was also an historical stain on the wall from an emission event. Staff requested that the facility clean up the material around the baghouse and do a better job maintaining the unit.

EU-Pretreatment

DESCRIPTION: Wheel surface preparation consisting of degreasing tanks (3), acidic, passivation and sealant tanks, which will be spray apply acidic or alkaline solutions to degrease (remove the machining fluid) and prepare the surface for proper coating adhesion to the aluminum. During various steps in the surface preparation process, water will be used to rinse off the alkaline and acidic solutions.

MONITORING/RECORDKEEPING
Requires monthly and 12-month rolling time period records of acid and degreasing solvent additions.

The facility provided copies of acid and degreasing additions for the previous 12-months.

EU-PretreatOven

DESCRIPTION: 7.6 MMBtu/hr Natural Gas Combustion Oven for removing the surface moisture on the wheels that have been treated.

After the wheels are processed through the pretreatment surface preparations they are conveyed through the pretreatment oven.

EMISSION LIMITS/DESIGN PARAMETERS

The primary requirement for the pretreat oven is the limited heat input capacity of 7.6 MMBtu per hour and NOx emission rate guarantee from the manufacture of 75 ppmv@3% O2. Additionally, fuel usage is limited to pipeline quality natural gas.

The facility appears to be in compliance with these requirements.

EU-PaintShopBlr

DESCRIPTION: 11.2 MMBtu/hr Natural gas Combustion Paint Shop Boiler

The Paint Shop boiler is located adjacent to the paint line thermal oxidizer.

EMISSION LIMITS/MATERIAL LIMITS/DESIGN PARAMETERS

The primary requirement for the pretreat oven is the limited heat input capacity of 11.2 MMBtu per hour and NOx emission rate guarantee from the manufacture of 75 ppmv@3% O2.

The previously observed rating plate listed 10.5 MMBtu.

The permittee shall burn only pipeline quality natural gas in EU-PaintShopBlr.

No other fuel supply was observed during the inspection, the facility supplied natural gas usage records for the boiler.

The facility is required to maintain records of monthly natural gas usage. The facility supplied the previous 12 months of fuel usage records as requested.

The permittee shall submit notification of the date of construction and actual startup of EU-PaintShopBlr in accordance with NSPS 40 CFR 60.7.

The notification was submitted on November 30, 2015.

EU-LiquidCoat

DESCRIPTION: One Base liquid coating booth and one Clear liquid coating booth, each utilizing high volume low pressure (HVLP) or comparable applicators, associated flash off tunnels, and one 2.6 MMBtu/hr Natural Gas Combustion Curing Oven. The VOC emissions from this line will be controlled by Non-Fugitive Enclosure (NFE) and a recuperative thermal oxidizer (TO). The particulate emissions are controlled by water spray.

EMISSION LIMITS

The emissions of VOC, Heavy aromatic solvent naphtha, Mixed Xylenes, Butyl carbitol, Formaldehyde and Naphthalene are limited by the permit.

Compliance with the VOC emission limit is based on compliance testing and proper operation of the thermal oxidizer. Compliance testing was conducted in September 2016, at which time compliance with the thermal oxidizer destruction efficiency (minimum 95%) was documented. Compliance with the Heavy aromatic solvent naphtha, Mixed Xylenes and Butyl carbitol emission limit is demonstrated via the facility recording daily usage of each material.

The facility is required to install and operate a thermal oxidizer with a minimum VOC destruction efficiency of 95% and maintain a minimum temperature of 1292 degrees F (700 degrees C).

Review of the RTO temperature records for the previous 8 days showed recorded temperatures at 725 degrees C, except for on August 16, 2019, when there was a 5 hour block where the average temperature dropped to 724.64 degrees C.

The facility is required to operate EU-LiquidCoat in a non-fugitive enclosure.

The facility has installed pressure drop gages to verify and demonstrate negative pressure in the bake oven, liquid base coat and liquid clear coat booths. Requested records for the previous 8 days were provided.

The facility is required to maintain coating usage and VOC emission records on a monthly basis. The facility provided records as requested, documenting compliance with the permitted limits.

The facility supplied records demonstrating compliance with the above requirements. Supplied records showed compliance with the VOC limit of 17.5 tpy based on a 12-month rolling average. The 12-month rolling emission rate ending in July 2019 was 0.46 tons.

The facility is required to maintain the following solvent usage records on a daily basis, the facility provided records of solvent usage, as requested.

The facility is required to maintain usage and HAP emissions data on a monthly basis. The facility provided records documenting compliance.

The records supplied demonstrated compliance with the applicable emission limits (below)

Pollutant	Limit	Time Period / Operating Scenario	Maximum emission rate from records
2. Heavy aromatic solvent naphtha (CAS No. 64742-94-5)	105.50 lb/day[1]	Calendar day	0.76 lb/day
3. Mixed Xylenes (CAS No. 1330-20-7)	150.66 lb/day[1]	Calendar day	1.43 lb/day
4. Butyl carbitol (CAS No. 112-34-5)	30.14 lb/day[1]	Calendar day	0.056 lb/day
5. Formaldehyde (CAS No. 50-00-0)	0.83 tpy[1]	12-month rolling time period as determined at the end of each calendar month	0.0 tons/12-month rolling time period
6. Naphthalene (CAS No. 91-20-3)	0.18 tpy[1]	12-month rolling time period as determined at the end of each calendar month	0.01 tons/12-month rolling time period

EU-BrushingBurr

DESCRIPTION: 12 Brushing Burr Machines controlled by a common fabric filter.

EMISSION LIMITS

The emission of PM is limited to 0.007 grains per dscf of gas. Compliance with the emission limit is based on proper operation of the fabric filter. To assure proper operation of the fabric filter unit the facility is required to monitor and record the pressure drop.

The facility supplied pressure drop records for the previous 30 days. The records showed all readings below the facility established 7" upper limit. The highest recorded pressure drop was 1.1 inch.

Observation of the baghouse showed no VE and good housekeeping practices.

EU-Gen1

DESCRIPTION: A 1,500 kilowatt (kW) or smaller diesel-fueled emergency engine with a model year of 2006 or later, and a displacement of less than 30 liters/cylinder. This emergency engine is subject to the New Source Performance Standards Stationary for Reciprocating Internal Combustion Engines (RICE), combustion ignition, emergency RICE less than 3000 HP.

EMISSION LIMITS/MATERIAL LIMITS

The permit limits the emission of NOx+HC, CO, PM, NOx and PM2.5.

Compliance is based primarily on the facility installing an EPA Certified engine and maintaining the engine in accordance with the manufacture recommendations.

Opacity from the unit is limited to 15% during lugging and 20% at all other times.

The unit is limited to burning diesel fuel with a maximum sulfur content of 15 ppm by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent.

The facility verifies compliance based on fuel delivery records. The facility provided a copy of a fuel analysis record from May 2019, demonstrating compliance with the sulfur content and Cetane index minimum.

The engine is limited to 500 hours of operation a year and 100 hours per year for maintenance checks. Compliance is based the requirement that engine be equipped with non-resettable hours meters and the maintaining records of the hours of operation. The facility provided records of the hours of usage showing 27.9 hours of total operation and 5.0 hours of maintenance operations. Both categories of usage are in compliance with the permit limits.

FG-Melting

DESCRIPTION: Two natural gas fired aluminum melting furnaces with burners rated at 10.1 MMBtu/hr and a capacity of 13.2 tons each, two natural gas fired aluminum chip melting furnaces with burners rated at 6.2 MMBtu/hr and a holding capacity of 13.2 tons each, two natural gas fired aluminum holding furnaces with burners rated at 2.7 MMBtu/hr and a holding capacity of 13.2 tons each, and the process transfer ladles.

Emission Units: EU-Melt1, EU-Melt2, EU-Chip1, EU-Chip2, EU-Hold1, EU-Hold2, EU-LadleHood

EMISSION LIMITS/RECORDKEEPING

The permit limits the emission of PM, PM10, PM2,5, HCL, HF, cadmium and chromium.

Compliance with the emission limits is demonstrated via material throughput limits, proper operation of the lime-injected baghouse and compliance testing. Compliance testing was conducted on May 8-10, 2018, at which time compliance was demonstrated for the following pollutants.

	Measured	Permit limit
PM (lb/hr)	0.25	2.92
PM-10 (lb/hr)	0.43	2.68
PM-2.5 (lb/hr)	0.42	1.89
HCL (lb/hr)	<0.02	7.69
HF (lb/hr)	<0.01	1.67

The facility provided records demonstrating compliance with the 12-month rolling total emission rate for HCL, cadmium and chromium.

HCL emissions recorded at 0.30 tons/12-month rolling (Limit=3.72 tpy)
Cadmium emission recorded at 1.01E-04 tons/12-month rolling (Limit=1.79E-04 tpy)
Chromium emissions recorded at 1.21 E-03 tons/12-month rolling (Limit=1.83E-3 tpy)

MATERIAL LIMITS/ RECORDKEEPING

Feed/charge and material through put rates are limited for each of the melting furnaces, chip furnaces, and holding furnaces, on a ton per hour basis. Review of the daily material usage records for the previous 8 days for each of the furnaces showed compliance with the limits. The highest charge rate for a melt furnace was 2.84 tons/hr (limit=3.31 tons/hr). The highest through put rate for a chip furnaces was 1.23 tons/hr (limit=3.31 tons/hr).
The highest throughput rate for a holding furnaces was 3.88 tons/hr (limit =4.96 tons/hr)

The melt rate for painted wheels is limited to 904,020 wheels per year. Review of the facility records (attached) shows a maximum of 61,833 wheels melted for the previous 12-months ending July 2019.

Flux usage is limited to 1,866 lb/day and 564,053 lb/yr. The facility provided daily (30 days), monthly and 12-month records for flux usage (previous 12 months). Facility records showed a daily flux usage high rate of 316 pounds, for records reviewed. Total flux usage for the previous 12-months was 70,189 pounds.
During the inspection and based on facility records, the facility appears to only use charge materials that are defined as clean charge under Subpart RRR. This includes ingots, internal scrap (chips) and rejected painted/unpainted wheels that have remained under the control of Dicastal.

PROCESS/OPERATIONAL RESTRICTIONS
The facility is required to implement and maintain a malfunction abatement plan (MAP). The facility previously submitted a MAP.

DESIGN/EQUIPMENT PARAMENTERS
FG-MELTING requires proper operation of a capture system and lime injected baghouse equipped with a bag leak detection system. The facility has capture for each of the furnaces which duct to a lime injected baghouse equipped with a bag leak detection system.

The facility supplied lime records which appear to show an injection rate of 29.5 lbs/hr. If this is correct, it is a large increase compared to the 5.9 lbs./hr. that was injected during stack testing.

TESTING/SAMPLING
Emission testing for PM, PM10, PM2.5, HCL and HF was required. Testing was conducted on May 8-10, 2018, at which time compliance was demonstrated.

Observations

During this inspection, fugitive emissions were observed being emitted into the in-plant atmosphere from the upper door of Melt Furnace 1. The furnace operator stated that the smoke occurred when they "free melted", during which time they are melting down the unit and drossing. Melt Furnace 2 did not appear to have the same problem, possibly due to a better door seal. The facility was going to look into improving the door seal on Melt Furnace 1.

FG-HeatTreat

DESCRIPTION: Three natural gas fired heat treat lines with burners rated at 10 MMBtu/hr each.

Emission Units: EU-HeatTreat1,EU-HeatTreat2,EU-HeatTreat3

EMISSION LIMITS/MATERIAL LIMITS

FG-HeatTreat does not have specific emission limits but is restricted to burn only pipeline quality natural gas. No gas other than pipeline quality natural gas has been observed in use.

DESIGN/EQUIPMENT PARAMETERS
The designed heat input for each burner in FG-HeatTreat is limited to 10MMBtu per hour. Compliance is based on the manufacture specifications.

FG-PowderCoat
DESCRIPTION: The powder coating process which includes two primer coatings booths, a 3.5 MMBtu/hr rated primer powder curing oven, one clear coating booth, and a 3.5 MMBtu/hr clear coat powder curing oven. The powder coating portions of this process are controlled by a dry filtering system with isolation chamber.

Emission Units: EU-PrimePowder, EU-PrimeOven, EU-ClearPowder, EU-ClearOven

EMISSION LIMITS/RECORDKEEPING

FG-PowderCoat has emission limits for PM and NOx. PM is limited to 0.03 tpy and NOx is limited to 75 ppmv@3%O2. Compliance with the PM limit is based on proper operation of the dry filtering system and isolation chamber. Compliance with the NOx limit is based on the manufacture guarantee.

PROCESS/OPERATIONAL RESTRICTIONS
Requires a minimum transfer efficiency of 93%. Compliance can be determined via testing.

FG-MACT6Z

DESCRIPTION: The affected source is the collection of all melting operations located at an aluminum, copper, or other nonferrous foundry, that is (or is part of) an area source of hazardous air pollutant (HAP) emissions. The affected source is a new small foundry as defined by 40 CFR Part 63 Subpart ZZZZZZ.

Emission Units: EU-Melt1, EU-Melt2, EU-Chip1, EU-Chip2, EU-Hold1, EU-Hold2, EU-LadleHood

Subpart 6Z establishes material limits regarding the type of scrap metal melted, covering each furnace

with a lid, if it is equipped with a lid, and operating in accordance with a management practices plan.

MATERIAL LIMITS/ RECORDKEEPING

The facility's charge material consists of ingot and internal scrap. Therefore, they are in compliance with the NESHAP requirements regarding the use of HAP metal depleted scrap.

PROCESS/OPERATIONAL RESTRICTIONS

The facility is complying with the cover and enclosing requirements for the furnaces. The facility provided a copy of the July 2019 furnace cover/enclosure inspection check sheet.

The facility previously submitted a written management practices plan as required by Subpart 6Z.

FGFACILITY

1. Each Individual HAP	Less than 8.9 tpy *	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy *	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)

The facility provided records demonstrating compliance with the emission limits and record keeping requirements for FGFACILITY.

For the 12-month period ending in July 2019, the total aggregate HAP emission amount was 4.16 tons. The individual HAP with the highest emission rate was mixed Xylenes with a single month remission rate of 0.04 tons and a 12-month rolling total of 0.56 tons.

CONCLUSION

Based on the information and observations made during this inspection, the facility is in compliance with applicable air quality rules and regulations, with the exception of the following: EU-ChipDryer - Documented exceedance of opacity limit.

A Violation Notice will be issued for the above documented violation.

NAME _____ DATE 9/3/2019 SUPERVISOR _____