



Compliance Assurance Monitoring Plan

Real Alloy Specification, LLC
and Real Alloy Recycling, LLC
Coldwater, Michigan

Real Alloy Specification, LLC
Real Alloy Recycling, LLC

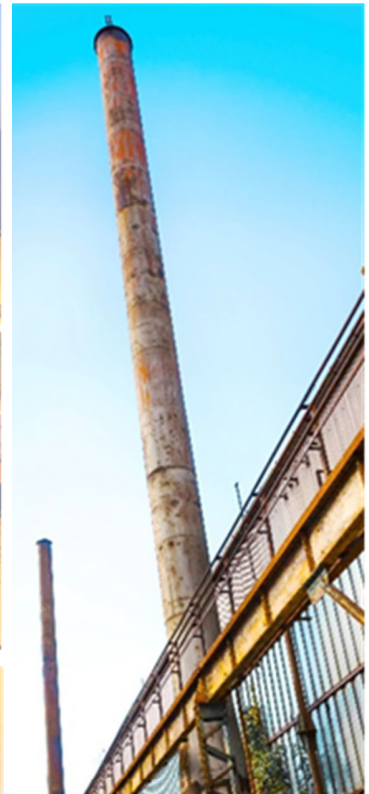




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1. Pollutant-Specific Emission Unit (PSEU)

1.1 Applicability

Per 40 CFR 64.2(a), the CAM requirement applies to a pollutant-specific emission unit (PSEU) at a major source that is required to obtain a Part 70 permit if the unit satisfies the following criteria:

1. *"The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 CFR 64.2(b)(1);*
2. *The unit uses a control device to achieve compliance with any such emission limitation or standard; and*
3. *The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source."*

Of special importance to the above, is the definition of "potential pre-control device emissions." Per Part 64, this shall have the same meaning as "potential to emit" as defined in Title V regulations except the emission reduction achieved by the applicable control device shall not be taken into account.

Part 70, of the Title V regulations defines potential to emit as *"...the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by the Administrator."*

While a facility cannot use air pollution control in determining the potential pre-control device emissions, as provided in the preceding paragraph, the facility will allow any existing or future operations limits (e.g. hours of operation, throughput) when making regulatory applicability determinations.

When determining the PSEUs that are applicable to CAM, the exemptions included in 64.2(b) must be considered.

The following PSEUs meet the criteria established in 64.2(a) and require inclusion in the CAM Plan.

Table 1.1 Pollutant-Specific Emission Units

Emission Unit ID	Pollutant of Concern	Potential Pre-Control Device Emissions	Potential Post-Control Device Emissions
EUIMREVERBFURN	PM	>100 TPY	<100 TPY
	PM-10	>100 TPY	<100 TPY
	PM-2.5	>100 TPY	<100 TPY
EUIMROTFURN1/2	HCl	>10 TPY	<10 TPY
	PM-10	>100 TPY	<100 TPY
	PM-2.5	>100 TPY	<100 TPY
EUALDRYER3	PM	>100 TPY	<100 TPY
	PM-10	>100 TPY	<100 TPY
	PM-2.5	>100 TPY	<100 TPY
EUALFURN1	THC	>100 TPY	<100 TPY
	PM-10	>100 TPY	<100 TPY
	PM-2.5	>100 TPY	<100 TPY
EUALFURN7/8	PM	>100 TPY	<100 TPY
	PM-10	>100 TPY	<100 TPY
	PM-2.5	>100 TPY	<100 TPY
	(via flue only) HCl	>100 TPY	<100 TPY
EUALSHREDDER	PM	>100 TPY	<100 TPY
	PM-10	>100 TPY	<100 TPY
	PM-2.5	>100 TPY	<100 TPY
EUALDROSS	PM	50 TPY	<100 TPY
	PM-10	>100 TPY	<100 TPY
	PM-2.5	>100 TPY	<100 TPY
EUIMHOTDROSS	PM	>100 TPY	<100 TPY
	PM-10	>100 TPY	<100 TPY
	PM-2.5	>100 TPY	<100 TPY

1.2 EUIMREVERBFURN

1.2.1 Emissions Unit

- Facility: Real Alloy Specification, LLC & Real Alloy Recycling, LLC
- Process/Emissions Unit: EUIMREVERBFURN. A reverberatory melting furnace having a charge capacity of 15,000 pounds per hour. Heat for melting is generated by natural gas burners having combined heat input rating of 32 MMBTU/hr. Emissions from natural gas combustion are emitted uncontrolled through SVIMREVFLUE. Emissions from fluxing and melting are controlled by a 70,000 CFM lime-injected baghouse and are vented from SVIMREVBH.
- Pollutants: PM, PM-10, PM-2.5, HCl
- Emissions Control Technique: Lime-Injected Baghouse
- Emission Egress Point Identification Number: SVIMREVBH
- Emission unit is subject to CAM because:
 - Pre-control emissions for PM, PM10 and PM2.5 are 75 tpy each (at 99% control efficiency)
 - Pre-control emissions for HCl are 120 tpy (at 99% control efficiency)
 - PM, PM10, PM2.5, and HCl have federally enforceable emission limitations that are not based on 40 CFR 60 Subpart RRR or other exempt emissions limitations in 40 CFR 64.2(b)(1).
 - Uses a lime injected baghouse to achieve compliance with the PM, PM10, PM2.5 and HCl emission limitations.

1.2.2 Applicable Requirements/Emissions Limitations

PM: 0.25 lb/ton of feed/charge and 0.75 tpy

PM-10: 0.25 lb/ton of feed/charge and 0.75 tpy

PM-2.5: 0.25 lb/ton of feed/charge and 0.75 tpy

HCl: 0.40 lb/ton of feed/charge and 1.2 tpy

1.2.3 Monitoring Approach

Monitoring is conducted in accordance with the Facility's OM&M plan. The table below identifies the relevant CAM items.

Applicable Requirement	PM, PM-10 and PM-2.5
General Monitoring Approach	Compliance with 40 CFR 63, Subpart RRR for HCl consisting of proper operation of the baghouse. Proper operation of the baghouse will minimize the emissions of PM, PM10, PM2.5 and HCl.

Monitoring Methods and Locations	Continuous Bag Leak Detector System (BLDS), inlet gas temperature, lime flow set point, lime flowrate, lime flow, flux rate, and molten metal height above arch.
Indicator Range/Source	BLDS Alarm Setpoint: 11 (in range of 0-100) BLDS Alarm Delay: 24 sec. Inlet Gas Temperature: 112F max Lime Flow Set Point: 0.50 minimum Lime Flow rate: 27 lb/hr Lime Flow: Flowing (via visual observation) Reactive Flux Injection Rate: 52.8 lb Chlorine/ton charged (max) Molten Metal Height above Arch: 15 inches (min).
Data Collection Frequency	BLDS: Continuous operation Inlet Gas Temperature: 15 min block averages from continuously monitored data Lime Flow Set Point: Daily Lime Flow Rate: Monthly Flow (visual check): ~8 hours (once per working shift) Reactive Flux Injection Rate: Once per cycle Molten Metal Height above Arch: Once per cycle
Averaging Period	Inlet Gas Temperature: 3 hr block average
Recordkeeping	Records of collected data are kept for at least 5 years.
QA/QC	BLDS: Maintained in accordance with manufacturers recommendations. Inlet Gas Temperature: Thermocouple checked at least every 6 months.

1.2.4 Justification and Rationale

Compliance with the above will insure that the baghouse continues to operate properly and achieve the desired PM-10, PM-2.5 and HCl emission limitations.

1.2.5 Additional Comments

For large pollutant specific emissions units (post control potential to emit equal to or greater than 100 percent of the amount required for a source to be classified as a major source), CAM requires the owner or operator to collect four or more data values over each hour. Since this emissions unit is not classified as a "large" source (post control potential to emit less than 100 TPY), this monitoring approach is not required

1.2.6 References/Information Source

- 40 CFR 63, Subpart RRR
- OM&M Plan

1.3 EUIMROTFURN1/2

1.3.1 Emissions Unit

- Process/Emissions Unit: EUIMROTFURN1/2. Two formerly separate furnaces that have become commonly controlled (EUIMROTFURN1 and EUIMROTFURN2). These are rotary melting furnaces with a combined hourly charge capacity of 42,000 pounds. Heat for melting is generated by natural gas burners having combined heat input rating of 56 MMBTU/hr. Emissions from EUIMROTFURN1/2 are vented through SVIMROT1/2BH.
- Facility: Real Alloy Specification, LLC & Real Alloy Recycling, LLC
- Pollutant: PM-10 and PM-2.5I
- Emissions Control Technique: Lime-Injected Baghouse
- Emission Egress Point Identification Number: SVIMROT1/2BH
- Emission unit is subject to CAM because:
 - Pre-control emissions for PM10 and PM2.5 are estimated to be 2,264 tpy each (at 99% control efficiency).
 - PM10 and PM2.5 have federally enforceable emission limitations that are not based on 40 CFR 60 Subpart RRR or other exempt emissions limitations in 40 CFR 64.2(b)(1).
 - Uses a lime injected baghouse to achieve compliance with the PM10 and PM2.5 emission limitations

1.3.2 Applicable Requirements/Emissions Limitations

PM-10: 0.50 lb/ton of feed/charge and 22.64 tpy

PM-2.5: 0.50 lb/ton of feed/charge and 22.64 tpy

1.3.3 Monitoring Approach

Monitoring is conducted in accordance with the Facility's OM&M plan. The table below identifies the relevant CAM items.

Applicable Requirement	PM-10 and PM-2.5
General Monitoring Approach	Compliance with 40 CFR 63, Subpart RRR for PM consisting of proper operation of the baghouse. Proper operation of the baghouse will minimize the emissions of PM10 and PM2.5.
Monitoring Methods and Locations	Continuous Bag Leak Detector System (BLDS), inlet gas temperature, lime flow set point, lime flowrate, and lime flow.

Indicator Range/Source	BLDS Alarm Setpoint: 14 (in range of 0-100) BLDS Alarm Delay: 96 sec. Inlet Gas Temperature: 221F (max) Lime Flow #1 Set Point: 2 Lime Flow #2 Set Point: 2 Lime Flow Rate (Total of #1 and #2): 174 lb/hr Flow: Flowing (via visual observation) Reactive Flux Injection Rate #1; 267 lb chlorine/ton charged (max) Reactive Flux Injection Rate #2: 262 lb chlorine/ton charged (max)
Data Collection Frequency	BLDS: Continuous operation Inlet Gas Temperature: 15 min block averages from continuously monitored data. Lime Flow Set Points: Daily Lime Flow Rate: Monthly Flow (visual check): ~8 hours (once per working shift) Reactive Flux Injection Rate: Once per cycle
Averaging Period	Inlet Gas Temperature: 3 hr block average
Recordkeeping	Records of collected data are kept for at least 5 years.
QA/QC	BLDS: Maintained in accordance with manufacturers recommendations. Inlet Gas Temperature: Thermocouple checked at least every 6 months.

1.3.4 Justification and Rationale

Compliance with the above will insure that the baghouse continues to operate properly and achieve the desired PM-10 and PM-2.5 emission limitations.

1.3.5 Additional Comments

For large pollutant specific emissions units (post control potential to emit equal to or greater than 100 percent of the amount required for a source to be classified as a major source), CAM requires the owner or operator to collect four or more data values over each hour. Since this emissions unit is not classified as a "large" source (post control potential to emit less than 100 TPY), this monitoring approach is not required

1.3.6 References/Information Source

- 40 CFR 63, Subpart RRR
- OM&M Plan

1.4 EUALDRYER3

1.4.1 Emissions Unit

- Process/Emissions Unit: EUALDRYER3. A rotating drum dryer capable of handling up to 15,000 pounds per hour of metal chips. Controlled emissions are vented through SVALDRY3OX. The chip dryer is controlled by an afterburner, cyclone, and 43,000 CFM baghouse system (Torit Baghouse #2).
- Facility: Real Alloy Specification, LLC & Real Alloy Recycling, LLC
- Pollutants: PM, PM-10, PM-2.5, and THC
- Emissions Control Technique: Pulse Jet Baghouse
- Emission Egress Point Identification Number: SVALDRY3OX
- Emission unit is subject to CAM because:
 - Pre-control emissions are as follows:
 - PM - 807 tpy
 - PM10 and PM2.5 - 1,004 tpy each
 - THC – 673 tpy
 - PM, PM10, PM2.5 and THC have federally enforceable emission limitations that are not based on 40 CFR 60 Subpart RRR or other exempt emissions limitations in 40 CFR 64.2(b)(1).
 - Uses an afterburner and baghouse to achieve compliance with the PM, PM10, PM2.5, and THC emission limitations

1.4.2 Applicable Requirements/Emissions Limitations

PM: 0.39 lb/ton of feed/charge and 8.07 tpy

PM-10: 0.485 lb/ton of feed/charge and 10.04 tpy

PM-2.5: 0.485 lb/ton of feed/charge and 10.04 tpy

THC: 0.65 lb/ton of feed/charge and 13.46 tpy

1.4.3 Monitoring Approach

Applicable Requirement	PM, PM-10, PM-2.5, and THC
General Monitoring Approach	Compliance with 40 CFR 63, Subpart RRR for PM and THC consisting of proper operation of the baghouse and afterburner. Proper operation of the baghouse and afterburner will minimize the emissions of PM, PM10, PM2.5 and THC.
Monitoring Methods and Locations	Afterburner temperature, continuous Bag Leak Detector System (BLDS), and baghouse inlet gas temperature.

Indicator Range/Source	BLDS Alarm Setpoint: 14 (in range of 0-100) BLDS Alarm Delay: 96 sec. Baghouse Inlet Gas Temperature: 408F (max) Afterburner Temperature: 1,443F (min)
Data Collection Frequency	BLDS: Continuous operation Baghouse Inlet Gas Temperature: 15 min block averages from continuously monitored data. Afterburner Temperature: 15 min block averages from continuously monitored data
Averaging Period	Baghouse Inlet Gas Temperature: 3-hr block average Afterburner Temperature: 3-hr block averages
Recordkeeping	Records of collected data are kept for at least 5 years.
QA/QC	BLDS: Maintained in accordance with manufacturers recommendations. Afterburner and baghouse inlet gas temperature thermocouples checked at least every 6 months.

1.4.4 Justification and Rationale

Compliance with the above will insure that the baghouse continues to operate properly and achieve the desired PM, PM-10, PM-2.5 and THC emission limitations.

1.4.5 Additional Comments

For large pollutant specific emissions units (post control potential to emit equal to or greater than 100 percent of the amount required for a source to be classified as a major source), CAM requires the owner or operator to collect four or more data values over each hour. Since this emissions unit is not classified as a "large" source (post control potential to emit less than 100 TPY), this monitoring approach is not required

1.4.6 References/Information Source

- 40 CFR 63, Subpart RRR
- OM&M Plan

1.5 EUALFURN1 (via SVALBH1)

1.5.1 Emissions Unit

- Process/Emissions Unit: EUALFURN1. A reverberatory melting furnace with an hourly charge capacity of 18,000 pounds. Heat for melting is generated by natural gas burners having combined heat input rating of 28 MMBTU/hr. Uncontrolled emissions from Furnace 1 Flue vented through SVALFURN1. Emissions from fluxing and melting are controlled by a 60,000 CFM lime-injected baghouse (Baghouse No. 2) and are vented from SVALBH1.
- Facility: Real Alloy Specification, LLC & Real Alloy Recycling, LLC
- Pollutants: PM, PM-10, and PM-2.5
- Emissions Control Technique: Lime-Injected Baggouse
- Emission Egress Point Identification Number: SVALBH1
- Emission unit is subject to CAM because:
 - Pre-control emissions for PM, PM10 and PM2.5 are estimated to be 248 tpy each (at 99% control efficiency).
 - PM, PM10, and PM2.5 have federally enforceable emission limitations that are not based on 40 CFR 60 Subpart RRR or other exempt emissions limitations in 40 CFR 64.2(b)(1).
 - Uses a lime injected baghouse to achieve compliance with the PM, PM10, and PM2.5 emission limitations

1.5.2 Applicable Requirements/Emissions Limitations

PM: 0.10 lb/ton of feed/charge and 2.48 tpy

PM-10: 0.10 lb/ton of feed/charge and 2.48 tpy

PM-2.5: 0.10 lb/ton of feed/charge and 2.48 tpy

1.5.3 Monitoring Approach

Applicable Requirement	PM, PM-10 and PM-2.5
General Monitoring Approach	Compliance with 40 CFR 63, Subpart RRR for PM consisting of proper operation of the baghouse. Proper operation of the baghouse will minimize the emissions of PM, PM10 and PM2.5.
Monitoring Methods and Locations	Continuous Bag Leak Detector System (BLDS), inlet gas temperature, lime flow set point, lime flowrate, lime flow, flux rate, and molten metal height.

Indicator Range/Source	BLDS Alarm Setpoint: 14 (in range of 0-100) BLDS Alarm Delay: 120 sec. Inlet Gas Temperature: 136F (max) Lime Flow Set Point: 3 Lime Flow rate: 118 lb/hr (min) Flow: Flowing (via visual observation) Reactive Flux Injection Rate: 67.6 lb chlorine/ton feed/charge (max) Molten Metal Height above Arch: 15 inches (min).
Data Collection Frequency	BLDS: Continuous operation Inlet Gas Temperature: 15 min block averages from continuously monitored data. Lime Flow Set Point: Daily Lime Flow Rate: Monthly Flow (visual check): ~8 hours (once per working shift) Reactive Flux Injection Rate: Once per cycle Molten Metal Height: Once per cycle
Averaging Period	Inlet Gas Temperature: 3 hr block average
Recordkeeping	Records of collected data are kept for at least 5 years.
QA/QC	BLDS: Maintained in accordance with manufacturers recommendations. Inlet Gas Temperature: Thermocouple checked at least every 6 months.

1.5.4 Justification and Rationale

Compliance with the OM&M plan will insure that the baghouse continues to operate properly and achieve the desired PM, PM-10, and PM-2.5 emission limitations.

1.5.5 Additional Comments

For large pollutant specific emissions units (post control potential to emit equal to or greater than 100 percent of the amount required for a source to be classified as a major source), CAM requires the owner or operator to collect four or more data values over each hour. Since this emissions unit is not classified as a "large" source (post control potential to emit less than 100 TPY), this monitoring approach is not required

1.5.6 References/Information Source)

- 40 CFR 63, Subpart RRR
- OM&M Plan

1.6 EUALFURN7/8 (via SVALBH7/8)

1.6.1 Emissions Unit

- Process/Emissions Unit: EUALFURN7/8. Two reverberatory melting furnaces (EUALFURN7 and EUALFURN8) with a combined hourly charge capacity of 17,000 pounds. Heat for melting is generated by natural gas burners having combined heat input rating of 30 MMBTU/hr. Emissions from natural gas combustion are controlled by a 90,000 CFM lime-injected baghouse (Baghouse 7/8) through SVALFURN7/8. **Emissions from fluxing and melting are controlled by a 65,000 CFM lime-injected baghouse (Baghouse #1) and are vented from SVALBH7/8.**
- Facility: Real Alloy Specification, LLC & Real Alloy Recycling, LLC
- Pollutants: PM, PM10, and PM-2.5
- Emissions Control Technique: Lime-Injected Baghouse
- Emission Egress Point Identification Number: SVALBH7/8
- Emission unit is subject to CAM because:
 - Pre-control estimated PTE emissions are as follows:
 - PM - 450 tpy (at 99% control efficiency)
 - PM10 - 810 tpy (at 99% control efficiency)
 - PM2.5 – 810 tpy (at 99% control efficiency)
 - PM, PM10, and PM2.5 have federally enforceable emission limitations that are not based on 40 CFR 60 Subpart RRR or other exempt emissions limitations in 40 CFR 64.2(b)(1).
 - Uses a lime injected baghouse to achieve compliance with the PM, PM10, and PM2.5 emission limitations

1.6.2 Applicable Requirements/Emissions Limitations

PM: 0.15 lb/ton of feed/charge and 4.50 tpy

PM10: 0.27 lb/ton of feed/charge and 8.1 tpy

PM2.5: 0.27 lb/ton of feed/charge and 8.1 tpy

1.6.3 Monitoring Approach

Applicable Requirement	PM, PM-10 and PM-2.5
General Monitoring Approach	Compliance with 40 CFR 63, Subpart RRR for PM consisting of proper operation of the baghouse. Proper operation of the baghouse will minimize the emissions of PM, PM10 and PM2.5.

Monitoring Methods and Locations	Continuous Bag Leak Detector System (BLDS), inlet gas temperature, lime flow set point, lime flowrate, lime flow, flux rate, and molten metal height.
Indicator Range/Source	BLDS Alarm Setpoint: 3 (in range of 0-100) BLDS Alarm Delay: 137 sec. Inlet Gas Temperature: 169F (max) Lime Flow Set Point: 3 Lime Flow rate: 76 lb/hr (min) Flow: Flowing (via visual observation) Reactive Flux Injection Rate #7: 77.9 lb Chlorine/ton charged (max) Reactive Flux Injection Rate #8: 70.1 lb Chlorine/ton charged (max) Molten Metal Height above Arch: 15 inches (min).
Data Collection Frequency	BLDS: Continuous operation Inlet Gas Temperature: 15 min block averages from continuously monitored data. Lime Flow Set Point: Daily Lime Flow Rate: Monthly Flow (visual check): ~8 hours (once per working shift) Reactive Flux Injection Rate: Once per cycle Molten Metal Height: Once per cycle
Averaging Period	Inlet Gas Temperature: 3 hr block average
Recordkeeping	Records of collected data are kept for at least 5 years.
QA/QC	BLDS: Maintained in accordance with manufacturers recommendations. Inlet Gas Temperature: Thermocouple checked at least every 6 months.

1.6.4 Justification and Rationale

Compliance with the above will insure that the baghouse continues to operate properly and achieve the desired PM, PM-10, and PM-2.5 emission limitations.

1.6.5 Additional Comments

For large pollutant specific emissions units (post control potential to emit equal to or greater than 100 percent of the amount required for a source to be classified as a major source), CAM requires the owner or operator to collect four or more data values over each hour. Since this emissions unit is not classified as a "large" source (post control potential to emit less than 100 TPY), this monitoring approach is not required

1.6.6 References/Information Source

- 40 CFR 63, Subpart RRR
- OM&M Plan

1.7 EUALFURN7/8 (via SVALFURN7/8)

1.7.1 Emissions Unit

- Process/Emissions Unit: EUALFURN7/8. Two reverberatory melting furnaces (EUALFURN7 and EUALFURN8) with a combined hourly charge capacity of 17,000 pounds. Heat for melting is generated by natural gas burners having combined heat input rating of 30 MMBTU/hr. **Emissions from natural gas combustion are controlled by a 90,000 CFM lime-injected baghouse (Baghouse 7/8) through SVALFURN7/8.** Emissions from fluxing and melting are controlled by a 65,000 CFM lime-injected baghouse (Baghouse #1) and are vented from SVALBH7/8.
- Facility: Real Alloy Specification, LLC & Real Alloy Recycling, LLC
- Pollutants: PM, PM-10, PM-2.5, and HCl
- Emissions Control Technique: Lime-Injected Baghouse
- Emission Egress Point Identification Number: SVALFURN7/8
- Emission unit is subject to CAM because:
 - Pre-control estimated PTE emissions are as follows:
 - PM - 450 tpy (at 99% control efficiency)
 - PM10 - 450 tpy (at 99% control efficiency)
 - PM2.5 – 450 tpy (at 99% control efficiency)
 - HCl – 1,200 tpy (at 99% control efficiency)
 - PM, PM10, PM2.5 and HCl have federally enforceable emission limitations that are not based on 40 CFR 60 Subpart RRR or other exempt emissions limitations in 40 CFR 64.2(b)(1).
 - Uses a lime injected baghouse to achieve compliance with the PM, PM10, PM2.5, and HCl emission limitations

1.7.2 Applicable Requirements/Emissions Limitations

PM: 0.15 lb/ton of feed/charge and 4.50 tpy

PM-10: 0.15 lb/ton of feed/charge and 4.5 tpy

PM-2.5: 0.15 lb/ton of feed/charge and 4.5 tpy

HCl: 0.40 lb/ton of feed charge and 12.00 tpy

1.7.3 Monitoring Approach

Applicable Requirement	PM, PM-10 and PM-2.5
General Monitoring Approach	Compliance with 40 CFR 63, Subpart RRR for PM consisting of proper operation of the baghouse. Proper operation of the baghouse will minimize the emissions of PM, PM10, PM2.5, and HCl.

Monitoring Methods and Locations	Continuous Bag Leak Detector System (BLDS), inlet gas temperature, lime flow set point, lime flowrate, and lime flow.
Indicator Range/Source	BLDS Alarm Setpoint: 21 (in range of 0-100) BLDS Alarm Delay: 60 sec. Inlet Gas Temperature: 350F (max) Lime Flow Set Point: 11.6 hz Lime Flow rate: 10 lb/hr Flow: Flowing (via visual observation)
Data Collection Frequency	BLDS: Continuous operation Inlet Gas Temperature: 15 min block averages from continuously monitored data. Lime Flow Set Point: Daily Lime Flow Rate: Monthly Flow (visual check): ~8 hours (once per working shift)
Averaging Period	Inlet Gas Temperature: 3 hr block average
Recordkeeping	Records of collected data are kept for at least 5 years.
QA/QC	BLDS: Maintained in accordance with manufacturers recommendations. Inlet Gas Temperature: Thermocouple checked at least every 6 months.

1.7.4 Justification and Rationale

Compliance with the above will insure that the baghouse continues to operate properly and achieve the desired PM, PM-10, PM-2.5, and HCl emission limitations.

1.7.5 Additional Comments

For large pollutant specific emissions units (post control potential to emit equal to or greater than 100 percent of the amount required for a source to be classified as a major source), CAM requires the owner or operator to collect four or more data values over each hour. Since this emissions unit is not classified as a "large" source (post control potential to emit less than 100 TPY), this monitoring approach is not required

1.7.6 References/Information Source

- 40 CFR 63, Subpart RRR
- OM&M Plan

1.8 EUALSHREDDER

1.8.1 Emissions Unit

- Process/Emissions Unit: EUALSHREDDER
- Facility: Real Alloy Specification, LLC & Real Alloy Recycling, LLC
- Pollutant: PM, PM-10, and PM-2.5
- Emissions Control Technique: Baghouse
- Emission Egress Point Identification Number: SVALSHRDBH
- Emission unit is subject to CAM because:
 - Pre-control estimated PTE emissions are as follows:
 - PM - 274 tpy (at 99% control efficiency)
 - PM10 - 274 tpy (at 99% control efficiency)
 - PM2.5 – 274 tpy (at 99% control efficiency)
 - PM, PM10, and PM2.5 have federally enforceable emission limitations that are not based on 40 CFR 60 Subpart RRR or other exempt emissions limitations in 40 CFR 64.2(b)(1).
 - Uses a baghouse to achieve compliance with the PM, PM10, and PM2.5 emission limitations.

1.8.2 Applicable Requirements/Emissions Limitations

PM: 0.10 lb/ton of feed/charge and 2.74 tpy

PM-10: 0.10 lb/ton of feed/charge and 2.74 tpy

PM-2.5: 0.10 lb/ton of feed/charge and 2.74 tpy

1.8.3 Monitoring Approach

Applicable Requirement	PM, PM-10, and PM-2.5
General Monitoring Approach	Compliance with 40 CFR 63, Subpart RRR for PM consisting of proper operation of the baghouse. Proper operation of the baghouse will minimize the emissions of PM, PM10, and PM2.5.
Monitoring Methods and Locations	Continuous Bag Leak Detector System (BLDS) and baghouse inlet gas temperature.
Indicator Range/Source	BLDS Alarm Setpoint: 9 (in range of 0-100) BLDS Alarm Delay: 137 sec. Baghouse Inlet Gas Temperature: 118F (max)
Data Collection Frequency	BLDS: Continuous operation Baghouse Inlet Gas Temperature: 15 min block averages from continuously monitored data.

Averaging Period	Baghouse Inlet Gas Temperature: 3-hr block average
Recordkeeping	Records of collected data are kept for at least 5 years.
QA/QC	BLDS: Maintained in accordance with manufacturers recommendations. Baghouse inlet gas temperature thermocouple checked at least every 6 months.

1.8.4 Justification and Rationale

Compliance with the above items will insure that the baghouse continues to operate properly and achieve the desired PM, PM-10, and PM-2.5 emission limitations.

1.8.5 Additional Comments

For large pollutant specific emissions units (post control potential to emit equal to or greater than 100 percent of the amount required for a source to be classified as a major source), CAM requires the owner or operator to collect four or more data values over each hour. Since this emissions unit is not classified as a "large" source (post control potential to emit less than 100 TPY), this monitoring approach is not required

1.8.6 References/Information Source

- 40 CFR 63, Subpart RRR
- OM&M Plan

1.9 EUALDROSS

1.9.1 Emissions Unit

- Process/Emissions Unit: EUALDROSS
- Facility: Real Alloy Specification, LLC & Real Alloy Recycling, LLC
- Pollutant: PM, PM-10, and PM-2.5
- Emissions Control Technique: Baghouse
- Emission Egress Point Identification Number: SVALDROSSBH
- Emission unit is subject to CAM because:
 - Pre-control estimated PTE emissions are as follows:
 - PM – 50.4 tpy (at 99% control efficiency)
 - PM10 - 350 tpy (at 99% control efficiency)
 - PM2.5 – 350 tpy (at 99% control efficiency)
 - PM, PM10, and PM2.5 have federally enforceable emission limitations that are not based on 40 CFR 60 Subpart RRR or other exempt emissions limitations in 40 CFR 64.2(b)(1).
 - Uses a baghouse to achieve compliance with the PM, PM10, and PM2.5 emission limitations.

1.9.2 Applicable Requirements/Emissions Limitations

PM: 0.115 lb/hr and 0.50 tpy

PM-10: 0.8 lb/hr and 3.50 tpy

PM-2.5: 0.8 lb/hr and 3.50 tpy

1.9.3 Monitoring Approach

Applicable Requirement	PM, PM-10, and PM-2.5
General Monitoring Approach	Compliance with 40 CFR 63, Subpart RRR for PM consisting of proper operation of the baghouse. Proper operation of the baghouse will minimize the emissions of PM, PM10, and PM2.5.
Monitoring Methods and Locations	Pressure drop across baghouse.
Indicator Range/Source	Normal Range: 0-12 inches water column
Data Collection Frequency	Normally every 4 hours (but not to exceed 8 hours)
Averaging Period	N/A
Recordkeeping	Records of collected data are kept for at least 5 years.

QA/QC	Pressure drop sensor maintained in accordance with manufacturers recommendations.
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1.9.4 Justification and Rationale

Compliance with the above items will insure that the baghouse continues to operate properly and achieve the desired PM, PM-10, and PM-2.5 emission limitations.

1.9.5 Additional Comments

For large pollutant specific emissions units (post control potential to emit equal to or greater than 100 percent of the amount required for a source to be classified as a major source), CAM requires the owner or operator to collect four or more data values over each hour. Since this emissions unit is not classified as a "large" source (post control potential to emit less than 100 TPY), this monitoring approach is not required

1.9.6 References/Information Source

- 40 CFR 63, Subpart RRR
- OM&M Plan

1.10 EUIMHOTDROSS

1.10.1 Emissions Unit

- Process/Emissions Unit: EUIMHOTDROSS
- Facility: Real Alloy Specification, LLC & Real Alloy Recycling, LLC
- Pollutant: PM, PM-10, and PM-2.5
- Emissions Control Technique: Baghouse
- Emission Egress Point Identification Number: SVIMDROSSBH
- Emission unit is subject to CAM because:
 - Pre-control estimated PTE emissions are as follows:
 - PM - 394 tpy (at 99% control efficiency)
 - PM10 - 394 tpy (at 99% control efficiency)
 - PM2.5 – 394 tpy (at 99% control efficiency)
 - PM, PM10, and PM2.5 have federally enforceable emission limitations that are not based on 40 CFR 60 Subpart RRR or other exempt emissions limitations in 40 CFR 64.2(b)(1).
 - Uses a baghouse to achieve compliance with the PM, PM10, and PM2.5 emission limitations.

1.10.2 Applicable Requirements/Emissions Limitations

PM: 0.90 lb/hr and 3.942 tpy

PM-10: 0.90 lb/hr and 3.942 tpy

PM-2.5: 0.90 lb/hr and 3.942 tpy

1.10.3 Monitoring Approach

Applicable Requirement	PM, PM-10, and PM-2.5
General Monitoring Approach	Compliance with 40 CFR 63, Subpart RRR for PM consisting of proper operation of the baghouse. Proper operation of the baghouse will minimize the emissions of PM, PM10, and PM2.5.
Monitoring Methods and Locations	Pressure drop across baghouse.
Indicator Range/Source	Normal Range: 0-12 inches water column
Data Collection Frequency	Normally every 4 hours (but not to exceed 8 hours)
Averaging Period	N/A
Recordkeeping	Records of collected data are kept for at least 5 years.
QA/QC	Pressure drop sensor maintained in accordance with manufacturers recommendations

1.10.4 Justification and Rationale

Compliance with the above items will insure that the baghouse continues to operate properly and achieve the desired PM, PM-10, and PM-2.5 emission limitations.

1.10.5 Additional Comments

For large pollutant specific emissions units (post control potential to emit equal to or greater than 100 percent of the amount required for a source to be classified as a major source), CAM requires the owner or operator to collect four or more data values over each hour. Since this emissions unit is not classified as a "large" source (post control potential to emit less than 100 TPY), this monitoring approach is not required

1.10.6 References/Information Source

- 40 CFR 63, Subpart RRR
- OM&M Plan



about GHD

GHD is one of the world's leading professional services companies operating in the global markets of water, energy and resources, environment, property and buildings, and transportation. We provide engineering, environmental, and construction services to private and public sector clients.

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