

Manila
Halls

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Metal Technologies, Inc. Three Rivers Gray Iron	SRN : B2015
Location : 429 Fourth Street	District : Kalamazoo
	County : SAINT JOSEPH
City : THREE RIVERS State: MI Zip Code : 49093	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Rex Lane
FCE Begin Date : 6/18/2013	FCE Completion Date : 6/30/2014
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
06/18/2014	Self Initiated Inspection	Non Compliance	Self Initiated Inspection

Activity Date	Activity Type	Compliance Status	Comments
03/20/2014	MAERS	Compliance	<p>Review of 2013 MAERS Report:</p> <p>On 3/10/14, staff contacted the facility based on a review of the previous year emission comparison report. For 2013, process throughputs increased by 3.5 to 5.2% over 2012, however, the change in reported emissions ranged from -83.1 to 710%. The wide differences in reported emissions appear to be related to the use of different stack test emission factors from the previous year for RGMOLDCOOLING, RGSANDHNDL, RGCLEANING, EUSHAKEOUT and RGMELT2012 primarily for carbon monoxide and filterable PM-10 and PM-2.5.</p> <p>The bulk of the test data that we have on file for TRG is reported in lbs.\1000 lbs. exhaust gas or in lbs.\hour versus MAERS stack test emission factors that are reported in lbs.\ton. Staff requested that the facility submit documentation (unit ID, date tested, process rate used to derive emission factor, etc.) for each stack test factor used in the MAERS 2013 report so that the audit review can be completed. The requested data was received on 3/12/14 and due to the number of changes that were needed to the MAERS report, staff failed the audit on 3/18/14 so the facility could make the necessary changes. Staff reviewed the documentation and emission calculations and no other changes were made to the report. -RIL</p>
01/28/2014	ROP Annual Cert	Compliance	<p>Annual ROP Certification Report: 1/1/13 - 12/31/13</p> <p>Report certification indicates that the facility was in compliance with all terms and conditions of their ROP and the Iron and Steel MACT regulations during the reporting period. The ROP certification report was submitted timely and contains an original signature by the facility's responsible official.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/28/2014	ROP SEMI 2 CERT	Compliance	<p>ROP Semi-Annual Compliance Certification Report: 7/1/13 - 12/31/13</p> <p>Report certification indicates that the facility was in compliance with all terms and conditions of their ROP and the Iron and Steel MACT regulations during the reporting period. The ROP certification report was submitted timely and contains an original signature by the facility's responsible official.</p>
01/28/2014	MACT (Part 63)	Compliance	<p>Part 63, Subpart EEEEE Semi-annual and Annual Compliance Certification; 1/1/13 - 12/31/13</p> <p>Report certification indicates that the facility was in compliance with all terms and conditions of their ROP and the Iron and Steel MACT regulations during the reporting period. The ROP certification report was submitted timely and contains an original signature by the facility's responsible official.</p>
01/28/2014	CAM Excursions/Exceedances	Compliance	<p>CAM Excursion/Exceedance Summary Report; 7/1/13 - 12/31/13</p> <p>Form one states that there were no CAM excursions or exceedances during the reporting period. The form was attached to their ROP certification report that was submitted timely and contains an original signature by the facility's responsible official.</p>
01/28/2014	CAM monitor downtime	Compliance	<p>CAM Monitor Downtime Incident Summary Report; 7/1/13 - 12/31/13</p> <p>Form two states that there were no CAM monitor downtime during the reporting period. The form was attached to their ROP certification report that was submitted timely and contains an original signature by the facility's responsible official.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/27/2013	ROP Semi 1 Cert	Compliance	<p>ROP Semi-annual Compliance Certification Report: 01/1/13 - 6/30/13</p> <p>Report was stamped received on 8/30/2013 and is considered to be timely. The report appears to contain an original signature by plant personnel that meets the requirements of a responsible official. The report indicates that there were no deviations from ROP terms and conditions during the reporting period. -RIL</p>
09/27/2013	CAM Excursions/Exceedances	Compliance	<p>Review of CAM Excursion/Exceedance Summary Report for 01/1/13 - 06/30/13:</p> <p>Report was signed and dated by the facility's responsible official. Form 1 attached to the ROP certification report indicates that there were no exceedances or excursions that occurred during the reporting period. -RIL</p>
09/27/2013	CAM monitor downtime	Compliance	<p>Review of CAM Monitor Downtime Summary Report for 01/1/13 - 06/30/13:</p> <p>Report was signed and dated by the facility's responsible official. Form 2 attached to the ROP certification report indicates that there were no CAM monitor downtime incidents that occurred during the reporting period. -RIL</p>
09/27/2013	MACT (Part 63)	Compliance	<p>Review of MACT ROP Certification Report for 1/1/13-06/30/13:</p> <p>Report was signed and dated by the facility's responsible official. The report states that there were no deviations from MACT emission limitations, work practice standards, O & M or CPMS requirements applicable to this facility during the reporting period. -RIL</p>
09/12/2013	Telephone Notes	Compliance	Testing Deadline Extension Request

07/30/2013	Stack Test	Compliance	<p>Review of PM and VE Test Report - Metal Technologies, Three Rivers Gray Iron</p> <p>Metal Technologies – Three Rivers Gray Iron (hereafter "MTI") was required to conduct performance testing of several emissions units prior to the expiration date of ROP Permit No. MI-ROP-B2015-2008. The test plan was submitted on 4/26/13 by Network Environmental Inc. on behalf of MTI. The test plan was approved by MDEQ-AQD on 5/30/13. Particulate matter testing was scheduled for EUSHAKEOUT; EUMOLDCOOLING1 through EUMOLDCOOLING4; EUSAND1/EUCASTTRANSFER1; EUSAND2/EUCASTTRANSFER2; and EUBLAST1-4.</p> <p>EUSHAKEOUT is controlled by the DUSTAR 1 baghouse (SVDUSTAR1). EUMOLDCOOLING1 through 4 are uncontrolled emission sources and a temporary six foot stack extension fitted with a vane straightener will be utilized on each of the four stacks (SVCOOLING1/4) for testing purposes.</p> <p>EUSAND1/EUCASTTRANSFER1 is controlled by the East and West Fuller baghouses that are cross-connected and vent to a common stack (SV1152-913).</p> <p>EUSAND2/EUCASTTRANSFER2 is controlled by the DUSTAR 2 (west) baghouse that vents to a common stack (SV565-932) that is shared with EUBLAST1-4 which is controlled by the North Fuller baghouse. Processes that have separate baghouse controls but share a common stack cannot effectively be tested on an individual basis and compliance will be demonstrated while both processes are in operation. Per information provided by Mr. Dann Hollenbeck, MTI - Corporate Environmental Manager, the average iron melt rate for the facility is about 24 tons/hour and about 6500 molds are produced per day.</p>
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07/30/2013	Stack Test	Compliance	<p>Particulate matter testing was conducted on June 11 – 13, 2013 using EPA Reference Method 5. All listed process vents were also observed for visible emissions using EPA Reference Method 9.</p> <p>The Test Report was received on July 25, 2013. PM test results for EUSHAKEOUT were about 9% and 7% of its respective PM concentration (0.04#/1000#) and pound/hour (13.5 #/hour) limits. PM test results for EUSAND1/EUCASTTRANSFER1 were about 10% and 7% of its respective PM concentration (0.04#/1000#) and pound/hour (15.8 #/hour) limits. PM test results for EUSAND2/EUCASTTRANSFER2 and EUBLAST1-4 were about 53% and 42% of its respective PM concentration (0.02#/1000#) and pound/hour (13.5 #/hour - EUSAND2/EUCASTTRANSFER2) limits.</p> <p>Visible emission observation forms for all process vents listed above were included at the end of the test report. A review of these forms indicates that only mold cooling vent # 4 had opacity readings above 0% with intermittent episodes of 5% opacity being observed.</p> <p>Appendix C contains source operating data for the mold production lines during each of the three test dates. Overall hourly mold production rates ranged between 914 and 1423 molds/hour for DISA # 1 through # 4 which is well above the average daily mold production rate provided by Mr. Hollenbeck.</p> <p>Mr. Hollenbeck has been contacted to submit an ROP certification report for this emissions test report. Test report indicates compliance with all visible emission and PM emission limits in MI-ROP-B2015-2008. - RIL</p>
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Name: RIL

Date: 6/30/14

Supervisor: MA 7/7/2014