

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 : Compliance
Source Class : MAJOR	Staff : Rex Lane
FCE Begin Date : 5/14/2015	FCE Completion Date : 6/14/2016
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
06/14/2016	Self Initiated Inspection	Compliance	Self Initiated Inspection
05/24/2016	MAERS	Compliance	MAERS Report Audit: Facility report was initially failed on 5/12/16 by staff so MTI contact, Mr. Dan Plant could provide emission documentation for RGMELT2012, RGMOLDCOOLING and RGSANDHNL and to report CO emissions for EUSHAKEOUT and RGMELT2012 that staff noted had been omitted from the report. MAERS resubmitted on 5/24/16 and staff reviewed stack test documentation. No changes were made to reported emissions in the revised report. -RIL
02/23/2016	ROP SEMI 2 CERT	Compliance	ROP Second Semi-Annual Certification Report ROP certification report contains an original dated signature by the facility's responsible official. This report contains two deviations that were reported under the semi-annual CAM Excursions/Exceedances report. -RIL

Activity Date	Activity Type	Compliance Status	Comments
02/23/2016	ROP Annual Cert	Compliance	<p>ROP Annual Certification Report</p> <p>ROP certification report contains an original dated signature by the facility's responsible official. Three deviations that were reported during the first semi-annual reporting period were listed along with the two visible emission events reported under the facility's CAM Excursions/Exceedances report. -RIL</p>
02/23/2016	CAM Excursions/Exceedances	Compliance	<p>Semi-annual CAM Excursion/Exceedance Report (Form 1)</p> <p>ROP certification report contains an original dated signature by the facility's responsible official. Form 1 table was included in this report and indicates that there were two days during the reporting period where visible emissions were observed from the baghouse controls for FGCLEANING and FGWDUSTAR for less than 24 hours. The baghouses were blacklighted to identify broken bags and a total of seven bags were replaced. The facility reports that the differential pressures were within limits during this period. A violation notice will not be sent at this time since the facility initiated prompt corrective measures. -RIL</p>
02/23/2016	CAM monitor downtime	Compliance	<p>Semi-annual CAM Monitor Downtime Report (Form 2)</p> <p>ROP certification report contains an original dated signature by the facility's responsible official. Form 2 table was included in this report and indicates that there were no monitor downtime incidents during the reporting period. -RIL</p>
02/16/2016	MACT (Part 63)	Compliance	<p>40 CFR Part 63, Subpart EEEEE Semi-annual Compliance Certification</p> <p>ROP certification report contains an original dated signature by the facility's responsible official. The cover letter attached to the ROP certification report states that there were no known MACT deviations during the reporting period. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
08/13/2015	ROP Semi 1 Cert	Compliance	Report contains an original dated signature by the facility's responsible official.
08/13/2015	CAM Excursions/Exceedances	Compliance	Report contains three instances of either missed pressure drop readings (EUSHAKEOUT) or pressure differential readings above range for FGCAMUNITS and FGGRAYIRON. Duration of deviations were less than two days total in length and in one case appeared to be related to cold weather conditions.
08/13/2015	CAM monitor downtime	Compliance	Facility reported several instances where differential pressure gauge was not operating properly due to frozen tap lines. This may continue to be an issue under cold weather conditions due to moisture content of air captured by EUSHAKEOUT.
08/13/2015	MACT (Part 63)	Compliance	ROP certification report contains an original dated signature by the facility's responsible official. Facility did not report any deviations under 40 CFR Part 63, Subpart EEEEE.

05/18/2015	Stack Test	Compliance	<p>EUSHAKEOUT Test Report</p> <p>On April 20, 2015, a test report was received from Metal Technologies' Three Rivers Gray Iron (TRGI) that was accompanied by an ROP certification report signed and dated by the facility's responsible official. Emission testing was required by PTI No. 137-14 and associated modified ROP MI-ROP-B2015-2015c to demonstrate compliance with PM limitations and confirm that the new 2014 North Dostar air collector on EUSHAKEOUT did not trigger PSD permitting thresholds. Testing was performed on February 26, 2015 and the report is considered timely because it was received within the 60 day timeframe required under the Part 10 rules. Testing firm was BTEC out of Royal Oak, MI and test methods were USEPA Method 5 and 202 to determine filterable and condensable PM and test intervals were triplicate 60 minute test runs.</p> <p>Please refer to MACES report (B201528685) for information about the performance test and district staff observations during testing. The melt rate during the emission test was approximately 2.5 tons/hour above the annual average melt rate for the facility based on production data emailed to staff on 3/2/15 so facility was presumed to be operating at or above the maximum routine operating rate during testing. Section 3.d of the test report provides a summary of the production rate data.</p> <p>The average PM emission rate based on testing was 1.72 lbs./hour and 0.006 lbs./1000 lbs. exhaust gas or approximately 15% of the respective permitted emission rate. Based on a maximum 7,525 hours/year theoretical operating rate, PM, PM10 and PM2.5 were calculated to be below their respective PSD thresholds. Section 5.b of the test report notes a positive bias in the test results due to organic condensable fraction (5.7 ug; 2 ug blank allowed by method) in the laboratory internal method blank.</p>
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05/18/2015	Stack Test	Compliance	however, the emission rate of each test run was well below the applicable PM limits.
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Name: Ric Date: 6/20/16 Supervisor: MB 6/20/2016
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