

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

B701339597

FACILITY: Huron Casting, Inc (Blue Diamond Steel Casting)		SRN / ID: B7013
LOCATION: 7050 HARTLEY ST. & 125 STURM RD, PIGEON		DISTRICT: Saginaw Bay
CITY: PIGEON		COUNTY: HURON
CONTACT: Mike Peterson , Plant Engineer		ACTIVITY DATE: 04/26/2017
STAFF: Sydney Bruestle	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Onsite inspection to verify compliance with PTI 115-16 and all other applicable state and federal air quality regulations.		
RESOLVED COMPLAINTS:		

On April 26, 2017 I (Sydney Bruestle) conducted an onsite inspection of Huron Casting Inc./Blue Diamond Steel Casting Inc. located at 7050 Hartley Street Pigeon, Michigan. While onsite I met with Mike Peterson (Environmental Engineer), Tom Voss (Facility Engineer). Mike Peterson was able to provide me with an tour of both facilities and the required records.

**Facility Description:**

The facility consists of two steel foundries, Blue Diamond Steel Casting (BD) and Huron Casting (HC) that are under common ownership and are located across the street from each other. The facility is considered one Major Stationary Source. Major production operations include raw metal handling, mold and core production, metal melting, pouring and cooling and casting finishing.

**Regulatory Overview**

The has recently started operating under a new PSD permit, PTI 115-16, issued March 30, 2017. The facility is major for CO and a synthetic minor source for HAPs and PM. The facility is subject to 40 CFR Part 63 Subpart ZZZZZ. The facility signed a consent order April 2017. The PSD permit will be rolled into an ROP within the year.

**Huron Casting**

Under 40 CFR Part 63 Subpart ZZZZZ Huron Casting is considered an existing large foundry. Below I will cover the processes at Huron Casting and the associated permit requirements, material limits, and emission limits.

*The Emission Units inspected for Huron Casting are summarized below:*

**EU-01:**

<i>Emission Unit</i>	<i>Emission Unit Description</i>	<i>Control Device</i>	<i>Emission Limits</i>	<i>Design/Equipment Parameters</i>	<i>Monitoring/Record Keeping</i>
EU-01	A-line east pouring line, Mag drum and shot air wash	Baghouse 774	PM10 0.02 pph PM2.5 0.004 pph	Leak Detection System installed/operating properly	Continuously monitor pressure drop across the baghouse and record on a daily basis
Records Reviewed	2.0 in WC			It appeared the leak detection system was installed and operating properly	
Compliance Status	Compliance				

EU-02

<i>Emission Unit</i>	<i>Emission Unit Description</i>	<i>Control Device</i>	<i>Emission Limits</i>	<i>Design/Equipment Parameters</i>	<i>Monitoring/Record Keeping</i>
EU-02	Vibramill, A-line Shake out sand elevator and conveyor, A-line shot leg	Baghouse 788	PM10 0.09 pph(24 hour average) PM2.5 0.018 pph (24 hour ave)	Leak Detection System installed/operating properly	Continuously monitor pressure drop across the baghouse and record on a daily basis
Records Reviewed	4.5 in WC			It appeared the leak detection system was installed and operating properly	
Compliance Status	Compliance				

EU-TORCHES 1-18

<i>Emission Unit</i>	<i>Emission Unit Description</i>	<i>Control Device</i>	<i>Emission Limits</i>
EU-TORCHES1-18	Cutting Torches #1-18	None	PM10 0.22 pph (24 hour average) PM2.5 0.044 pph (24 hour average)
Records Reviewed	Yes		
Compliance Status	Compliance		

EU-05

<i>Emission Unit</i>	<i>Emission Unit Description</i>	<i>Control Device</i>	<i>Emission Limits</i>	<i>Design/Equipment Parameters</i>	<i>Monitoring/Record Keeping</i>
EU-05	Vibramill, shot air wash, B-le east end pouring line	Baghouse 791	PM10 0.73 pph(24 hour average) PM2.5 0.146 pph (24 hour ave)	Leak Detection System installed/operating properly	Continuously monitor pressure drop across the baghouse and record on a daily basis
Records Reviewed	4.1 in WC			It appeared the leak detection system was installed and operating properly	
Compliance Status	Compliance				

EU-06

<i>Emission Unit</i>	<i>Emission Unit Description</i>	<i>Control Device</i>	<i>Emission Limits</i>	<i>Material Limits</i>	<i>Process/Operational Restrictions</i>	<i>Design/ Equipment Parameters</i>	<i>Monitoring and record keeping</i>
				Shall not			

EU-06	Sand coating/handling and reclaim operations	Baghouse 787	PM10 0.540 pph (24 hour average) PM 2.5 0.012 pph (24 hour average)	exceed a loss of one percent resin based on total weight for the resin coated sand in the mold/core making process from pouring through shakeout	Minimum temperature of 1,200 degrees F of the calcining furnace is maintained Written operation and maintenance plan for the furnace submitted to AQD within 180 days of permit issuance	Leak Detection System installed/operating properly	Continuous monitor pressure drop across the baghouse and record on a daily basis
Records Reviewed	2.9 in WC		Yes	Have not operated this Calciner in 5 years	It appeared the leak detection system was installed and operating properly		
Compliance Status	Compliance						

EU-07

Emission Unit	Emission Unit Description	Control Device	Emission Limits	Material Limits	Process/Operational Restrictions	Design/Equipment Parameters	Monitoring and record keeping
EU-07	Sand coating/handling and reclaim operations Vibramill	Baghouse 484 Baghouse 1001	PM10 0.540 pph (24 hour average) PM 2.5 0.012 pph (24 hour average)	Shall not exceed a loss of one percent resin based on total weight for the resin coated sand in the mold/core making process from pouring through shakeout	Minimum temperature of 1,200 degrees F of the calcining furnace is maintained Written operation and maintenance plan for the furnace submitted to AQD within 180 days of permit issuance	Leak Detection System installed/operating properly	Continuous monitor pressure drop across the baghouse and record on a daily basis
Records Reviewed	Baghouse 484: 2.5 in WC Baghouse 1001: 1 in WC		Yes	1353 Degrees F	It appeared the leak detection system was installed and operating properly		
Compliance Status	Compliance						

EU-08

<i>Emission Unit</i>	<i>Emission Unit Description</i>	<i>Control Device</i>	<i>Emission Limits</i>	<i>Process/Operational Restrictions</i>	<i>Design/ Equipment Parameters</i>	<i>Monitoring and record keeping</i>
EU-08	Cut off Saws #1-9, Grinders #1-13, 7 to 12 hand grinders, 7 welders	Baghouse 616	PM10 0.5 pph (Test Protocol) PM2.5 0.5 pph (test protocol)	Baghouse must be installed and operated in a satisfactory manner	Leak Detection System installed/operating properly	Continuously monitor pressure drop across the baghouse and record on a daily basis
Records Reviewed	2.3 in WC		It appeared the leak detection system was installed and operating properly			
Compliance Status	Compliance					

EU-09

<i>Emission Unit</i>	<i>Emission Unit Description</i>	<i>Control Device</i>	<i>Emission Limits</i>	<i>Process/Operational Restrictions</i>	<i>Design/ Equipment Parameters</i>	<i>Monitoring and record keeping</i>
EU-09	Shot Blast equipment	Baghouse 618	PM10 0.5 pph (24 hour Ave) PM2.5 0.01 pph (24 hour ave)	Baghouse must be installed and operated in a satisfactory manner	Leak Detection System installed/operating properly	Continuously monitor pressure drop across the baghouse and record on a daily basis
Records Reviewed	2.3 in WC		It appeared the leak detection system was installed and operating properly			
Compliance Status	Compliance					

EU-10A

<i>Emission Unit</i>	<i>Emission Unit Description</i>	<i>Control Device</i>	<i>Emission Limits</i>	<i>Process/Operational Restrictions</i>	<i>Design/ Equipment Parameters</i>	<i>Monitoring and record keeping</i>
EU-10A	Sand Leg and mag drum, shot legs, vibratory mold dumper/ conveyor	Baghouse 864 Baghouse 776	PM10 0.66 pph (24 hour Ave) PM2.5 0.132 pph (24 hour ave)	Baghouse must be installed and operated in a satisfactory manner	Leak Detection System installed/operating properly	Continuously monitor pressure drop across the baghouse and record on a daily basis
Records Reviewed	Baghouse 864: 5.9 in WC Baghouse 776: 5 in WC		It appeared the leak detection system was installed and operating properly			
Compliance Status	Compliance					

**The Flexible groups for Huron Casting are summarized below:**

**FG-POUR**

Flexible Group	FG Description	Pollution Control	Emission Limits	Process/Operational Restrictions	Design/Equipment Parameters	Monitoring/Record Keeping
FG-POUR	<p><b>EUPOURINGA:</b> 3 induction furnaces, pouring line A and ancillary equipment controlled by Baghouse 790</p> <p><b>EUPOURLINEB:</b> 3 induction furnaces, pouring line B and ancillary equipment controlled by baghouse 554 and Baghouse 553</p>	<p>Baghouse 790,</p> <p>Baghouse 554,</p> <p>Baghouse 553</p>	<p>PM10 0.5 pph</p> <p>PM 0.5 pph</p>	<p>Baghouses must be installed and operated in a satisfactory manner</p>	<p>Leak Detection System installed/operating properly on each baghouse</p>	<p>Continuously monitor pressure drop across each baghouse and record on a daily basis</p>
Records Reviewed	<p>790: 4.5 in WC</p> <p>554: 2.6 in WC</p> <p>553: 4.0 in WC</p>			<p>It appeared the leak detection system was installed and operating properly</p>		
Compliance Status	<p>Compliance</p>					

**FG-MOLDLINE**

Flexible Group	FG Description	Pollution Control	Emission Limits	Material Limits	Process/Operational Restrictions	Design/Equipment Parameters	Testing/Sampling	Monitoring/ Record Keeping
FG-MOLDLINE	<p>Molding Machines 1-26 and cutting torches 19-22 No control.</p> <p>A line west end pouring line A-line cooling room: BH 789</p> <p>West end pouring line B, B-line cooling room: BH 792</p> <p>All equipment exhausts through SV-03</p>	<p>Baghouse 789</p> <p>Baghouse 792</p>	<p>PM 0.008 lb/1000 lbs exhaust gas (test)</p> <p>PM10 4.6 pph (24 hour ave)</p> <p>PM2.5 0.922 pph (24 hour ave)</p> <p>Phenol 1.95 pph (test protocol)</p>	<p>Shall not use more than 1,480 tons per year of binder in FG-MOLDLINE (based on a 12 month rolling time period)</p> <p>Max phenol content of any binder used shall not exceed 1.1% by weight</p>	<p>Maintain and operate both baghouses with a leak detection system installed</p>	<p>Shall not operate EU-03A or EU-03B unless the associated baghouse is installed, maintained and operated in a satisfactory manner.</p>	<p>Verification of PM10 and PM2.5 and or phenol emission rates from SV-03 by testing may be required.</p>	<p>12 month rolling time period records of sand usage rate and binder usage rate. Copies of all certificate of analysis for binders. Calculations verifying the actual phenol in percent by weight</p> <p>Shall, during the month of MAY, on an annual basis, verify the analysis of the phenol content of each of the binders which were used in the previous month of April and that loss of binder is no more than 1% in</p>

							spent mold/core sand. Results of the testing shall be submitted to AQD prior to June 30.
Records Reviewed	789: 4 in WC 792: 2 in WC		12 month rolling sum in March 2017: 476 tpy	It appeared the leak detection system was installed and operating properly			
Compliance Status	Compliance						

**Blue Diamond Steel Casting**

Under 40 CFR Part 63 Subpart ZZZZZ Blue Diamond Steel Casting is considered an new large foundry. Below I will cover the processes at Blue Diamond Casting and the associated permit requirements, material limits, and emission limits

The Emission Units inspected for Blue Diamond Casting are summarized below:

**EU-NBFURNACE**

Emission Unit	Emission Unit Description	Control Device	Emission Limits	Design/ Equipment Parameters	Testing/ Sampling	Monitoring/ Record Keeping
EU-	Three electric induction furnaces: two 8-ton capacity melt furnaces, one electric arc ladle reheat	BH-01	PM 0.005 grains/dscf (test) PM10 2.14	Shall equip and maintain BH-01	180 days after trial operation- electric arc ladle reheat station- shall verify PM and PM10 emission rates from EU-NBFURNACE by testing Within 60 days of permit issuance or 60 days after the installation of the electric arc ladle reheat station, shall provide the hood capture system design specs,	Monthly Records of tons of steel melted for EU-NBFURNACE

NBFURNACE	station, and a vacuum degassing unit for an expected melting capacity of 200 tons per day.		pph (test) PM2.5 0.5 pph (test)	with a bag leak detection system.	operating procedures, and signed certified package from qualified contractor, certifying no less than 90% capture efficiency 180 days after commencement of trial operation of the arc ladle reheat station, shall conduct initial smoke test to verify capture efficiency.	Shall monitor and record negative pressure drop for BH-01
Records Reviewed	3 in WC			Yes, leak detection system was in place and appeared to be operating properly	Testing was done February 28, 2017. Results have not been submitted to AQD	Yes the pressure drop for BH-01 was 3 inches WC
Compliance Status	Compliance					

EU-NBMOLD

Emission Unit	Emission Unit Description	Control Device	Material Limits	Monitoring/Record Keeping
EU-NBMOLD	The mold making process that blends the sand and binder, preps and cures the molds, and sets the molds out into the casting lines	None	Shall not process more than 1,550 tons of binder per year in EU-NBMOLD based on a 12 month rolling time period, determined at the end of each calendar month	Shall record monthly and yearly binder usage rate for EU-NBMOLD
Records Reviewed	Yes		59.1 tons of binder (Through March 2017)	Yes
Compliance Status	Compliance			

<i>Emission Unit</i>	<i>Emission Unit Description</i>	<i>Control Device</i>	<i>Emission Limits</i>	<i>Design/Equipment Parameters</i>	<i>Monitoring/Record Keeping</i>
EU-SHELLFURNACE	Shell furnace line consists of three 8-ton capacity electric induction furnaces (expected melting capacity 200 tons/day)	BH-06	PM 0.005 grains/dscf PM10 2.14 pph PM2.5 0.5 pph	Leak Detection System installed/operating properly on each baghouse	Monthly records of tons of steel melted for EU-SHELLFURNACE
Records Reviewed	Yes			Yes, leak detection system was in place and appeared to be operating properly	5-8 tons per month. 12 month rolling sum of 19.8 tons per year (March 2017)
Compliance Status	Compliance				

**EU-NBTORCHES**

<i>Emission Unit</i>	<i>Emission Unit Description</i>
EU-NBTORCHES	No-bake cutting Torches with the exhaust emitted into the cutting area
Records Reviewed	Yes
Compliance Status	Compliance

**EU-SHELLTORCHES**

<i>Emission Unit</i>	<i>Emission Unit Description</i>
EU-SHELLTORCHES	Shell cutting Torches with the exhaust emitted into the cutting area
Records Reviewed	Yes
Compliance Status	Compliance

**EU-FINISHING**

<i>Emission Unit</i>	<i>Emission Unit Description</i>	<i>Control Device</i>	<i>Emission Limits</i>	<i>Process/Operational Restrictions</i>	<i>Design/ Equipment Parameters</i>	<i>Monitoring/ Record Keeping</i>
EU-FINISHING	Finishing process consists of grinders, shot blast, cut off saws, wheelabrators, and welders.	BH-10	PM 0.004 lb/1000 lbs of exhaust gases PM10 0.5 pph PM2.5 0.5 pph	BH installed, maintained and operated in accordance with the manufacturers	Shall maintain BH-10 with a bag leak detection system. Shall not operate BH-10 unless leak detection system is installed and	Continuously monitor pressure drop across each baghouse and record on a daily



Compliance Status	Compliance
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**The Flexible groups for Blue Diamond Steel Casting are summarized below:**

**FG-BDSV01**

Flexible Group	FG Description	Pollution Control	Emission Limits	Design/Equipment Parameters	Testing/ Sampling	Monitoring/ Record Keeping
FG-BDSV01	Emission Units exhausted through stack SV-01. EU-NBPOURANDCOOL, the no-bake pouring and cooling room consists of a pouring hood and enclosed cooling room which is controlled by a 40,000 cfm baghouse (BH-02) and EU-SHELLCOOL the shell cooling room encloses cast molds on a conveyor and is controlled by a 40,000 cfm baghouse (BH-07)	BH-02 and BH-07	PM 0.005 grains/dscf PM10 0.260 pph (24 hour ave) PM2.5 0.052 pph (24 hour ave)	Shall not operate EU-NBPOURANDCOOL unless BH-02 is installed, maintained, and operated in a satisfactory manner  Shall not operate EU-SHELLCOOL unless BH-7 is installed, maintained, and operated in a satisfactory manner Both BH-02 and BH07 shall operate only with a bag leak detection system installed and operated	Verification of PM, PM10 and PM2.5 emission rates from FG-BDSV01 by testing may be required.	Records shall be maintained on file for a period of 5 years
Records Reviewed	BH2: 3 in WC BH7: 3.9 in WC		Yes, leak detection system was in place and appeared to be operating properly			
Compliance Status	Compliance					

**FG-BDSV02**

Flexible Group	FG Description	Pollution Control	Emission Limits	Material Limits	Process/ Operational Restrictions	Design/ Equipment Parameters	Testing/ Sampling	Monitoring/ Record Keeping
	Emission units							

FG-BDSV02	material in the mold facing and core sand from the shell line by heating it to 1200 Degree F before the sand is returned the the shell sand system for recycling. The calciner is controlled by a binder, prepares and cures the molds, and sets the molds out on the casting lines. The emissions from this process are captured with a hood with a flow rate of 71,000 cfm. Includes 25 to 30 core machines which emit to the in-plant environment.	BH-09	PM- 0.005 grain/dscf PM10 1.650 pph (24 hour ave) PM2.5 0.330 pph (24 hour ave)	Shall not process more than 840 tons of binder per year in EU-SHELLMOLD portion of FG-BDSV02. Based on a 12 month rolling time period.	SHELLCALCINER portion of FG-BDSV-02 unless a minimum temperature of 1200 Degrees F of the calcining furnace is maintained. Shall not operate EU-SHELLCALCINER unless a written Operation and Maintenance plan for the furnace has been submitted to the AQD District Supervisor within 180 days of permit issuance.	SHELLCALCINER unless encloser and BH-09 are installed maintained and operated in a satisfactory manner Shall equip and maintain BH-09 with a bag leak detection system Shall install, callibrate, maintain and operate in a satisfactory manner a devioce to monitor and record the temperature of EU-SHELLCALCINER.	Verification of PM, PM10 and PM2.5 emission rates from FG-BDSV02 by testing may be required	Shall keep temperature records Shall keep records of monthly and yearly binder usage rate for EU-SHELLMOLD.
Records Reviewed	3.1 in WC		161.58 tpy in March 2017	1292 Degrees F	Yes, leak detection system was in place and appeared to be operating properly			
Compliance Status	Compliance							

**FG-BDSV03**

Flexible Group	FG Description	Pollution Control	Emission Limits	Material Limits	Process/ Operational Restrictions	Design/ Equipment Parameters	Testing/ Sampling	Monitoring/ Record Keeping
FG-BDSV03	Emission Units exhausted through SV-03. EU-NBCALCINER; the calciner is used to destroy the binder material in the mold facing and core sand from the no-bake line by heating to 1200F before the sand is returned to the no-bake sand system	BH-04	PM: 0.005 grains/dscf PM10: 1.61 pph PM2.5 0.322 pph	Shall not process more than 1550 tons of binder per year in FG-BDSV03 based	Shall not operate EU-NBCALCINER unless a minimum temp of 1200 F of the calcining furnace is maintained Shall not operate EU-NBCALCINER unless a written operation and maintenance	Shall not operate EU-NBCALCINER unless enclosure and BH_03 are installed maintained and operated according to manufacturer recommendations Shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the temp continuously Shall not operate EU-NBSAND portion unless	Verification of PM, PM10, and PM2.5 emission rates by testing may be	Shall Keep temp records Shall keep records of monthly and yearly binder usage rate

	for recycling. The calciner is controlled by a shakeout, cooling conveyor, sand tanks, and elevators. The sand system is controlled by a 40,000 cfm baghouse (BH-04)		on a 12 month rolling time period.	plan for the furnace has been submitted to the AQD district supervisor within 180 days of permit issuance.	enclosure and BH-04 are installed, maintained and operated according to manufacturer recommendations. Shall equip and maintain both baghouse (BH-03) and baghouse (BH-4) with a bag leak detection system.	required.	for FG-BDSV03.
Records Reviewed	3 in WC		687 tpy in March 2017	Not operating Calciner records were available	Yes, leak detection system was in place and appeared to be operating properly		
Compliance Status	Compliance						

FG-BDSV04

Flexible Group	FG Description	Pollution Control	Emission Limits	Material Limits	Design/Equipment Parameters	Testing/Sampling	Monitoring/Record Keeping
	Emission units exhausted through Stack SV-04 EU-SHELLSAND: the shell sand system includes the	BH-08	PM: 0.005 grains/dscf	Shall not process more than 840 tons of binder	Shall not operate EU-SHELLPOUR unless BH-05 is installed, maintained and operated according to manufacturer recommendations. Shall not operate EU-SHELLSAND unless	Verification of PM, PM10, and PM2.5	Shall record monthly and

FG-BDSV04	mechanical reclaim, dumper, shakeout conveyor, shot sand screen, vibramill, bucket elevators, and sand tanks.	and BH-05	PM10: 1.430 pph PM2.5: 0.286 pph	per year, based on a 12 month rolling time period.	enclosure and BH-08 are installed, maintained and operated according to manufacturer recommendations Shall equip and maintain both baghouses with a bag leak detection sysyem while operating.	emission rates by testing may be required.	yearly binder usage rates.
Records Reviewed	BH08: 4.5 in WC BH05: 3 in WC		March 17 687 tpy	Yes, leak detection system was in place and appeared to be operating properly			
Compliance Status	Compliance						

**FG-BDSV05**

Flexible Group	FG Description	Pollution Control	Emission Limits	Material Limits	Design/Equipment Parameters	Testing/Sampling	Monitoring/Record Keeping
	Emission units exhausted through stack SV-05. EU-SHELL2POUR: This unit includes the pourline, shot separator, and shot cooler. All activities are controlled by a 50,000 cfm baghouse (BH-18). EU-			Shall not	Shall not operate unless BH-17, BH-18 and BH-19 are installed, maintained and		

FG-BDSV05	SHELL2COOL: The shell cooling room encloses cast molds on a conveyor and is controlled by baghouses BH-19A and BH-19B. EU-SHELL2SAND: the shell sand system includes the mechanical reclaim, dumper, shakeout conveyor, shot sand screen, vibramill, bucket elevators, torch stations, and sand tanks. The sand system is controlled by a 40,000 cfm baghouse (BH-17).	BH-18 BH-19 BH-17	PM: 0.005 grains/dscf PM10: 1.68 pph PM2.5: 0.336 pph	process more than 840 tons of binder per year in FG-BDSV05 based on a 12 month rolling time period.	operated according to manufacturer recommendations. Shall equip and maintain each baghouse with a leak detection system. Shall not operate baghouses with out leak detection systems operating properly.	Verification of PM, PM10, and PM2.5 emission rates by testing may be required.	Shall record monthly and yearly binder usage rates.
Records Reviewed	BH18: 2.5 BH19A: 3 in WC BH19B: 3 in WC BH17: 2 in WC		March 2017 697 tpy	Yes, leak detection system was in place and appeared to be operating properly			
Compliance Status	Compliance						

**Facility Wide (Both Huron Casting Inc and Blue Diamond Steel Casting Inc)**

Applicable permit requirements and emission limits for both facilities are summarized below.

**FG-MACTZZZZZ**

Flexible Group	FG Description	Emission Limits	Material Limits	Process/ Operational Restrictions	Design/ Equipment Parameters	Testing/ Sampling	Monitoring/ Record Keeping	Reporting
		PM: 0.8 lb/ton of metal charged (Any metal melting furnace at				Within 180 days after the applicable compliance date specified in 40 CFR 63.10881, the permittee shall conduct a performance	Shall prepare an O&M plan for each control device for an emissions source subject to PM, Metal HAP or opacity emissions limit in 63.10895. Shall maintain a copy of the	

<p>FG- MACTZZZZZ</p>	<p>The affected source is a new or existing iron and steel foundry, that is an area source of hazardous air pollutants (HAP) emissions. Huron Casting Inc. is an existing large foundry as defined by 40 CFR Part 63 Subpart ZZZZ. Blue Diamond Steel Casting is a new large foundry as defined by 40 CFR Part 63 Subpart ZZZZ.</p>	<p>Huron Casting, Inc.) Total Metal HAP: 0.06 lb/ton of metal charged (Any metal melting furnace at Huron Casting, Inc.) PM: 0.1 lb/ton of metal charged (Any Metal Melting furnace at Blue Diamond Steel Casting) Total Metal HAP: 0.008 lb/ton of metal charged (Any metal melting furnace at Blue Diamond Steel Casting)</p>	<p>Shall not utilize a binder chemical formulation that uses methanol as a specific ingredient of the catalyst for a warm box mold or core making line.</p>	<p>Shall implement and maintain an approved plan to address the pollution prevention management practices for metallic scrap and mercury switched by the applicable compliance date specified in 40 CFR 63.10881 Plan should include the following: a. Metallic Scrap Management program b. Mercury Requirements</p>	<p>Shall not operate and metal melting furnace at the iron and steel foundry unless a capture and collection system is installed, maintained, and operated in accordance with the American conference of Governmental Industrial Hygienist standards or equivalent unless the furnace is specifically uncontrolled as part of an emissions averaging group</p>	<p>test to demonstrate initial compliance with PM emission limits for each metal melting furnace. The permittee shall conduct subsequent tests to demonstrate compliance with all applicable PM or total HAP emission limits no less than every 5 years. The permittee shall conduct each opacity test for fugitive emissions according to the requirements in 63.6(h)(5) and Table 1 of 40 CFR Part 63 Subpart ZZZZ. The permittee shall conduct subsequent performance tests every 6 months or less.</p>	<p>O&amp;M plan at the facility and make it available for review upon request. Within 60 days after the applicable compliance date, the permittee shall conduct an initial inspection of each PM control device for each metal melting furnace. Shall install a bag leak detection system. Shall prepare a site specific monitoring plan for each bag leak detection system. Monthly inspections of equipment that is important to the performance of the total capture system. Monthly records. Notice of Compliance</p>	<p>Submit semiannual compliance reports</p>
<p>Records Reviewed</p>	<p>**The facility tested EU-NBFURNACE February 28, 2017. The test results showed PM emissions of 0.24 lb/ton metal charged which exceeds the limit of 0.1 lb/ton metal charged. The facility is requesting a retest. A VN was not sent</p>							<p>Yes</p>
<p>Compliance Status</p>	<p>Compliance</p>							

FG-Facility

Flexible Group	FG Description	Emission Limits	Material Limits	Process/Operational Restrictions	Monitoring/Record Keeping
<p>FG-FACILITY</p>	<p>All Equipment at the Huron Casting and Blue Diamond Steel Casting Facilities.</p>	<p>PM10: 59.6 tpy PM2.5: 11.9 tpy VOC: 50 lb/ton Binder VOC: 98 tpy Individual HAPs: 8.9 tpy Aggregate HAPs: 22.4 tpy CO: 4.8 lb/ton</p>	<p>Shall not Melt more than 144,000 tons of metal per year based on a 12 month rolling time period Shall not melt more than 72,000 tons per year in the Huron Casting Inc portion of FG-FACILITY Shall not melt more than 72,000 tons per year in the Blue Diamond Steel Casting portion of FG-FACILITY Shall not use more than 1,026 MMcf per year of natural gas in</p>	<p>Shall not operate each emission unit that is subject to an emission limit included in FG-FACILITY more than 7,000 hours per year based on a 12 month rolling time period. Shall not operate any of the 29 baghouses at the facility unless a malfunction abatement plan has been</p>	<p>Keep Records of metal melted in tons per month for FG-FACILITY 90 days after issuance of permit develop spreadsheet for approval by DEQ AQD supervisor 12 month rolling time period and monthly emission rates for PM, PM10 and PM2.5, VOCs, HAPS, and CO for FG-FACILITY monthly and 12 month rolling time period operating hour records for each emission unit subject to an emission limit included in FG-</p>

		<i>melt</i> CO: 345.6 tpy	FG-FACILITY Shall not Process a combined total of more than 3,870 tons of binder per year in FG-MOLDLINE, FG-BDSV03, FG-BDSV04, and FG-BDSV05 based on a 12 month rolling time period	submitted to the AQD district supervisor within 180 days of permit issuance.	FACILITY Monthly and 12 month rolling time period records of natural gas usage rates monthly and 12 month rolling time period records of binder usage rates
Records Reviewed	**12 month rolling time period Through March 2017 PM: 31.4 tpy VOC: 11.9 tpy Individual HAP: highest: 6.8 tpy Aggregate HAP: 17 tpy CO: 87.2 tpy (Spread sheet attached)		*12 month rolling time period through March 2017: Facility Total: 64423 tons metal Huron metal melted: 28088 tons metal Blue Diamond: 36335 tons metal Natural Gas Usage: 240,028 mCF Binder: 687 tons/year	Hours March 2017: 6008 hours/year	Not yet received
Compliance Status	Compliance				

Compliance Determination:

On February 28, 2017 the facility failed a PM emissions test of EU-NBFURNACE. As a result, the facility is not in compliance with PTI 115-16 or 40 CFR Part 63 Subpart ZZZZZ. The Facility has plans to retest the emission unit ASAP to determine if the failure was due to testing error. or is a true emission limit Exceedance. Until the retest the facility is not in compliance with PTI 115-16 or 40 CFR Part 63 Subpart ZZZZZ.

NAME Sydney Barz

DATE 05/04/17

SUPERVISOR C. Stone