

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

M375458375

FACILITY: Peerless Metal Powders & Abrasives		SRN / ID: M3754
LOCATION: 18900 RIALTO, MELVINDALE		DISTRICT: Detroit
CITY: MELVINDALE		COUNTY: WAYNE
CONTACT: Bob Fuller , Executive V.P. & GM		ACTIVITY DATE: 05/20/2021
STAFF: Samuel Liveson	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

On May 20, 2021, AQD staff (Sam Liveson) conducted an announced, scheduled inspection of Peerless Metal Powders and Abrasives (Peerless) located at 18900 Rialto Street in Melvindale, Michigan. The purpose of this inspection was to determine the facility's compliance with the federal Clean Air Act; Part 55, Air Pollution Control, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Michigan Air Pollution Control Rules; and the conditions of Permit to Install (PTI) No. 34-19A.

The temperature was 72 °F. Wind was southerly (headed north) at three miles an hour according to wunderground.com. Weather was partly cloudy.

Announced Inspection

Due to health and safety concerns related to the COVID-19 pandemic, scheduled inspections from the AQD are announced for the time being. On May 12 and May 13, 2021, I talked with Mr. Fuller and about visiting the facility on May 20th.

Pre-Inspection Surveillance – No Opacity

From 9:15 AM until 9:24 AM, AQD observed the facility stacks from Rialto Street. No opacity was observed from any of the eight stacks associated with the facility.

Opening Meeting

AQD was met by Mr. Robert (Bob) Fuller, Executive VP & GM; and Mr. Clyde Robison, Maintenance Manager. Mr. Robison provided facility records, and both provided a walkthrough of the facility.

Facility Process Overview

During the opening meeting, we discussed the facility process. Peerless receives busheling and turnings made of iron and steel. The company recycles the material into grit and shot used in blast cleaning operations. All materials received are recycled. Grit and shot are distinguished by their shape; grit is angular, and shot is round. Generally, any indirect heating by natural gas is vented to atmosphere, while any direct firing that touches product is vented to a baghouse. The north side of the facility houses foundry operations (melting and drying), while the south side of the facility houses forging operations (crushing and milling).

The facility currently operates one shift Monday through Friday from about 8 AM to 4:30 PM. The facility has no boilers or cold cleaners. One emergency generator is located on site but has not been installed at this time.

Recent Facility Move and Construction

Peerless was previously located at 156 South Cavalry Avenue and 124 South Military Street in Detroit. Because the facility was on a parcel designated for construction of the Gordie Howe Bridge, Peerless moved its operations to 18900 Rialto Street in Melvindale, Michigan. PTI No. 34-19, approved in July of 2019, relocated the facility's existing operation and permitted two induction furnaces. PTI No. 34-19A, approved in March of 2020, corrected the capacity of induction furnaces from 70 tons per day to 100 tons per day each and made several other changes.

According to Mr. Fuller, the building at their new location has entirely new walls and ceiling. The baghouses on site are new; the facility determined that the one existing baghouse at the previous facility location was prohibitive to move to the new location.

Operations have begun in the past year. Mr. Fuller explained that induction furnace operation FG-MELT began in November of 2020. From facility throughput records, the earliest operation was EU-MILL2 in August of 2020 (EU-MILL1 has not begun operation). FG-DRYERCRUSHER began operating in October of 2020.

Emission Units and Compliance Status

Foundry (North Side) – FG-MELT

We visited the foundry, which was operating. The foundry or FG-MELT line is on the north side of the building. This north side of Peerless receives bushelings that are deposited and stored inside the building. Busheling is picked up by a claw crane and then melted in one of two induction furnaces (controlled by the furnace baghouse system).

Melting occurs in two induction furnaces (EU-INDUCTIONMELT1, EU-INDUCTIONMELT2). According to Mr. Fuller and from facility records, melting started in November of 2020. Mr. Fuller explained that hardening and tempering furnaces are primarily associated with foundry operations; these began operation in December of 2020 according to facility throughput records.

FG-MELT Special Conditions and Compliance Status

SC(s)	Brief Condition Summary	Determination	Explanation
I.1-4	Emission limits for PM, PM10, and PM2.5	Not Evaluated	Compliance with these emission limits would be determined by a stack test per S.C. V.1.
I.5	Opacity Limit of 5% over 6 minutes	Compliance	Daily visible emissions observations documentation provided for November of 2020 (as requested) indicate no visible emissions. No visible emissions were observed during the facility inspection.
III.1	Malfunction Abatement Plan (MAP)	Compliance	Peerless implemented and maintains a MAP. Mr. Robison provided the MAP during the inspection. AQD approved the plan on July 2, 2021.
III.1.a	PM program with supervisory personnel, items to inspect, frequency, and identifying parts to maintain for quick replacement	Compliance	Facility personnel provided; frequency on pages 7 & 8; and manufacturer part information provided on page 24. Eventually bags will need to be changed, but they are currently new. The facility doesn't have the experience with new bags to know how long they will last, but will replace them based on pressure gauge readings. Pneumatic nozzles knock accumulated dust from bags periodically.
III.1.b	Variables to be monitored	Compliance	Water column weekly per page 9
III.1.c	Corrective procedures to take in the event of a malfunction	Compliance	Procedures for corrective action on pages 9, 10, and 11
IV.1	Baghouses installed and operating in a satisfactory manner	Compliance	According to Mr. Fuller, baghouses are new. Observation of the outside of the baghouse indicates no signs of rusting, holes, or disrepair.
IV.2	Pressure gauge which sounds an alarm	Compliance	During the inspection, pressure gauges were operating and read 2.42 inches water and 0.25 inches water. However, Mr. Robison explained that alarms weren't in place. On

SC(s)	Brief Condition Summary	Determination	Explanation
			June 15, 2021, Mr. Robison provided an email with images demonstrating that strobe alarms have been installed and are operating.
V.1	Stack testing	Not Evaluated	No opacity was observed, and pressures indicated that baghouses were working properly and were properly maintained. Because of this, I did not request stack testing.
VI.1	Visible emissions reading	Compliance	Daily readings for November 2020 were provided to AQD.
VIII.1, 2	Stack dimensions	Compliance	Stacks exhaust vertically unobstructed. Dimensions appeared similar to permit requirements.

Aspirating, Drying, and Segregating - EU-ASPDYSEG1 & EU-ASPDYSEG2

After melting, material undergoes aspiration, drying, and segregating via either EU-ASPDYSEG1 and EU-ASPDYSEG2.

Hardening and Tempering – EU-HRDNG/HTTREAT

From segregation, material can be finished via hardening and tempering heaters (EU-HRDNG/HTTREAT). Hardening occurs at about 1600 °F, leading to air-based (fluidized bed) quenching. Quenching does not involve oil or water. From talking with Mr. Fuller, it appears that hardening vents to the plant baghouse. Tempering occurs between 400 and 800 °F and is indirect-fired, so this furnace vents to atmosphere.

EU-HRDNG/HTTREAT Special Conditions and Compliance Status

SC(s)	Brief Condition Summary	Determination	Explanation
I.1-7	Hourly emissions limits for NO _x , CO, SO ₂ , PM, PM ₁₀ , PM _{2.5} , and VOCs	Not Evaluated	Hourly emissions are based on emission factors for maximum natural gas fuel consumption. Emissions appear to exhaust to the in-plant environment. Testing is not required.
III.1	Combust only natural gas	Compliance	Per Mr. Fuller and Mr. Robison, only natural gas is combusted in hardening and tempering heaters.

South Side – Forging – Crushing and Milling

We visited forging operations on the south side of the building. Here, turnings are deposited and stored in a covered pile outside of the building. These turnings are oily by nature, which helps control fugitive dust emissions from the storage pile. Turnings are conveyed into the building. The south side of the building includes the ring crusher, chip dryer, and mills.

Ring Crusher and Chip Dryer (FG-DRYERCRUSHER)

FG-DRYERCRUSHER is a ring crusher and chip dryer. The crusher is called a ring crusher due to it being in the shape of a ring. Regarding the chip dryer, the chips the facility receives have oil. The chip dryer burn retort furnace burns off the oil. The furnace is operated at 1200 °F. Exhaust from the oil burning is then burned in an afterburner with a setpoint of 1400 °F before going to a mechanical separator and then to the chip dryer baghouse.

FG-DRYERCRUSHER Special Conditions and Compliance Status

SC(s)	Brief Condition Summary	Determination	Explanation
VI.2		Compliance	

	Temperature in the afterburner at intervals not to exceed 15 minutes per interval		Afterburner temperature for the last week of October 2020 was provided as a daily value. Peerless indicated temperatures are recorded less frequently than every 15 minutes. On July 15, in response to a violation notice for recording afterburner temperature at intervals greater than 15 minutes, Mr. Fuller provided a sample of updated afterburner temperature logs for June 29, 2021. Temperatures were taken every 15 minutes. The facility is working on an automated logging system.
VIII.1	Stack dimensions	Compliance	Stack exhausts vertically unobstructed. Dimensions appeared similar to permit requirements.
I.1-6	Emission limits for NO _x , CO, PM, PM10, and PM2.5	Not Evaluated	Compliance with these emission limits would be determined by a stack test per S.C. V.1.
I.7	Opacity Limit of 5% over 6 minutes	Compliance	Daily visible emissions observations documentation provided for February of 2020 (as requested) indicate no visible emissions. No visible emissions were observed during the facility inspection.
II.1	Combust only natural gas	Compliance	Per Mr. Fuller and Mr. Robison, only natural gas is combusted in the chip dryer retort furnace and afterburner.
III.1	Malfunction Abatement Plan (MAP)	Compliance	Peerless implements and maintains a MAP. Mr. Robison provided the MAP during the inspection. AQD approved the plan on July 2, 2021.
III.1.a	PM program with supervisory personnel, items to inspect, frequency, and identifying parts to maintain for quick replacement	Compliance	Facility personnel provided; frequency on pages 7 & 8; and manufacturer part information provided on page 24. Eventually bags will need to be changed, but they are currently new. The facility doesn't have the experience with new bags to know how long they will last, but will replace them based on pressure gauge readings. Pneumatic nozzles knock accumulated dust from bags periodically.
III.1.b	Variables to be monitored	Compliance	Water column weekly per page 9.
III.1.c	Corrective procedures to take in the event of a malfunction	Compliance	Procedures for corrective action on pages 9, 10, and 11.
IV.1	Baghouses and smoke hood installed and operating in a satisfactory manner	Compliance	According to Mr. Fuller, baghouses are new. Observation of the outside of the baghouse indicates no signs of rusting, holes, or disrepair.
IV.2	Pressure gauge which sounds an alarm	Compliance	The chip dryer was not operating during the inspection. Records of daily pressure gauge readings from January of 2021 indicate a typical pressure around 1.3 inches water. Mr. Robison explained that alarms weren't in place. On June 15, 2021, Mr. Robison provided an email with images demonstrating that strobe alarms have been installed and are operating.
IV.3	Afterburner minimum temperature of 1400 °F	Compliance	Daily afterburner readings provided for October of 2020 indicate an afterburner temperature greater

	and retention time of 0.5 seconds		than 1400 °F. According to Mr. Fuller, afterburner thermocouple calibration occurs quarterly.
V.1	Stack testing	Not Evaluated	No opacity was observed, and the baghouse appears to work properly and be properly maintained. Because of this, I did not request stack testing.
VI.1	Visible emissions reading	Compliance	Daily readings for February 2021 were provided to AQD.

FG-MILLS

Mills are also on the south side of the building in the forging area. One baghouse controls the mills. One of two mills is in operation. From facility throughput records, EU-MILL2 began operation in August of 2020. This mill was not running during the inspection. EU-MILL1 has not begun operation.

FG-MILLS Special Conditions and Compliance Status

SC(s)	Brief Condition Summary	Determination	Explanation
I.1-3	Emission limits for PM, PM10, and PM2.5	Not Evaluated	Compliance with these emission limits would be determined by a stack test per S.C. V.1.
I.4	Opacity Limit of 5% over 6 minutes	Compliance	Daily visible emissions observations documentation provided for April of 2021 (as requested) indicate no visible emissions. No visible emissions were observed during the facility inspection.
III.1	Malfunction Abatement Plan (MAP)	Compliance	Peerless implemented and maintains a MAP. Mr. Robison provided the MAP during the inspection. AQD approved the plan on July 2, 2021.
III.1.a	PM program with supervisory personnel, items to inspect, frequency, and identifying parts to maintain for quick replacement	Compliance	Facility personnel provided; frequency on pages 7 & 8; and manufacturer part information provided on page 24. Eventually bags will need to be changed, but they are currently new. The facility doesn't have the experience with new bags to know how long they will last, but will replace them based on pressure gauge readings. Pneumatic nozzles knock accumulated dust from bags periodically.
III.1.b	Variables to be monitored	Compliance	Water column weekly per page 9.
III.1.c	Corrective procedures to take in the event of a malfunction	Compliance	Procedures for corrective action on pages 9, 10, and 11.
IV.1	Baghouses installed and operating in a satisfactory manner	Compliance	According to Mr. Fuller, baghouses are new. Observation of the outside of the baghouse indicates no signs of rusting, holes, or disrepair.
IV.2	Pressure gauge which sounds an alarm	Compliance	During the inspection, the mill room baghouse was operating, and the pressure gauge read 3.46 inches water. Mr. Robison explained that alarms weren't in place. On June 15, 2021, Mr. Robison provided an email with images demonstrating that strobe alarms have been installed and are operating.
V.1	Stack testing	Not Evaluated	No opacity was observed, and the pressure reading indicated that the baghouse was working properly and being properly maintained. Because of this, I did not request stack testing.
VI.1	Visible emissions reading	Compliance	Daily readings for April of 2021 were provided to AQD.

SC(s)	Brief Condition Summary	Determination	Explanation
VIII.1	Stack dimensions	Compliance	Stack exhausts vertically unobstructed. Dimensions appeared similar to permit requirements.

FG-PLANTBH

Emissions from aspiration units and various operations vent to the plant baghouse system. There are three baghouses. The ventilation system was designed so only two of the three baghouses need to operate at any time; one can be down for repair without needing to stop operations. Baghouses are numbered 5A, 5B, and 5C. While on site, baghouse 5A had a reading of 1.81 inches water; baghouse 5B read 1.16 inches water; and baghouse 5C was not running.

FG-PLANTBH Special Conditions and Compliance Status

SC(s)	Brief Condition Summary	Determination	Explanation
I.1-6	Emission limits for NO _x , CO, PM, PM10, PM2.5, and VOCs	Not Evaluated	Compliance with these emission limits would be determined by a stack test per S.C. V.1.
I.7	Opacity Limit of 5% over 6 minutes	Compliance	Daily visible emissions observations documentation provided for March of 2021 (as requested) indicate no visible emissions. No visible emissions were observed during the facility inspection.
III.1	Malfunction Abatement Plan (MAP)	Compliance	Peerless implemented and maintains a MAP. Mr. Robison provided the MAP during the inspection. AQD approved the plan on July 2, 2021.
III.1.a	PM program with supervisory personnel, items to inspect, frequency, and identifying parts to maintain for quick replacement	Compliance	Facility personnel provided; frequency on pages 7 & 8; and manufacturer part information provided on page 24. Eventually bags will need to be changed, but they are currently new. The facility doesn't have the experience with new bags to know how long they will last, but will replace them based on pressure gauge readings. Pneumatic nozzles knock accumulated dust from bags periodically.
III.1.b	Variables to be monitored	Compliance	Water column weekly per page 9.
III.1.c	Corrective procedures to take in the event of a malfunction	Compliance	Procedures for corrective action on pages 9, 10, and 11.
IV.1	Baghouses installed and operating in a satisfactory manner	Compliance	According to Mr. Fuller, baghouses are new. Observation of the outside of the baghouse indicates no signs of rusting, holes, or disrepair.
IV.2	Pressure gauge which sounds an alarm	Compliance	During the inspection, baghouse 5A had a reading of 1.81 inches water; baghouse 5B read 1.16 inches water; and baghouse 5C was not running. Mr. Robison explained that alarms weren't in place. On June 15, 2021, Mr. Robison provided an email with images demonstrating that strobe alarms have been installed and are operating.
V.1	Stack testing	Not Evaluated	No opacity was observed, and the pressure readings indicated that the baghouse was working properly and being properly maintained. Because of this, I did not request stack testing.
VI.1	Visible emissions reading	Compliance	Daily readings for March of 2021 were provided to AQD.

FG-IRONLINE

FG-IRONLINE includes miscellaneous iron and steel operations. The magnetic separator EU-MAGSEPARATOR is not yet in operation. EU-REPUBLICLINE is setup but was not operating during the inspection. EU-IRONSCREENER is setup but was not operating during the inspection. EU-BLUELINE is not yet in operation. FG-IRONLINE operations vent to the Iron Line Baghouse.

FG-IRONLINE Special Conditions and Compliance Status

SC(s)	Brief Condition Summary	Determination	Explanation
I.1-3	Emission limits for PM, PM10, and PM2.5	Not Evaluated	Compliance with these emission limits would be determined by a stack test per S.C. V.1.
I.4	Opacity Limit of 5% over 6 minutes	Compliance	Daily visible emissions observations documentation provided for February of 2021 (as requested) indicate no visible emissions. No visible emissions were observed during the facility inspection.
III.1	Malfunction Abatement Plan (MAP)	Compliance	Peerless implemented and maintains a MAP. Mr. Robison provided the MAP during the inspection. AQD approved the plan on July 2, 2021.
III.1.a	PM program with supervisory personnel, items to inspect, frequency, and identifying parts to maintain for quick replacement	Compliance	Facility personnel provided; frequency on pages 7 & 8; and manufacturer part information provided on page 24. Eventually bags will need to be changed, but they are currently new. The facility doesn't have the experience with new bags to know how long they will last, but will replace them based on pressure gauge readings. Pneumatic nozzles knock accumulated dust from bags periodically.
III.1.b	Variables to be monitored	Compliance	Water column weekly per page 9.
III.1.c	Corrective procedures to take in the event of a malfunction	Compliance	Procedures for corrective action on pages 9, 10, and 11.
IV.1	Baghouses installed and operating in a satisfactory manner	Compliance	According to Mr. Fuller, baghouses are new. Observation of the outside of the baghouse indicates no signs of rusting, holes, or disrepair.
IV.2	Pressure gauge which sounds an alarm	Compliance	During the inspection, the iron line baghouse was not running. Mr. Robison explained that alarms weren't in place. On June 15, 2021, Mr. Robison provided an email with images demonstrating that strobe alarms have been installed and are operating.
V.1	Stack testing	Not Evaluated	No opacity was observed, and pressures indicated that baghouses were working properly and properly maintained. Because of this, I did not request stack testing.
VI.1	Visible emissions reading	Compliance	Daily readings for February of 2021 were provided to AQD.

FGFACILITY

FGFACILITY includes all process equipment. It contains source-wide emissions limits, natural gas combustion limits, requirements for a fugitive dust control plan, and recordkeeping requirements for facility equipment.

The fugitive dust control plan appears to be effective. Walking around the facility, no trackout was observed.

As of August 4, 2021, emissions records and natural gas usage records have not been provided. The facility is working with DTE to receive monthly natural gas usage records. They have begun taking meter readings in June, but had planned to rely on DTE's readings before June. Upon receiving this information from DTE, they will work with their consultant to calculate monthly and 12-month rolling emissions.

The most monthly melt processing the facility has conducted is 418 tons in June of 2021. The permit emission limits were calculated based upon a maximum melt capacity of 200 tons per day (100 tons per furnace).

FGFACILITY Special Conditions and Compliance Status

SC(s)	Brief Condition Summary	Determination	Explanation
I.1-8	12-month emission limits for NO _x , CO, PM, PM10, PM2.5, VOC, Individual HAP, and Aggregate HAP	Not determined	The facility did not calculate emissions of these pollutants per SC VI.1(f), (h), and (j)-(l). Because operations are not near capacity according to Mr. Fuller, and FG-MELT only began operation in November of 2020, facility emissions do not likely exceed these limits.
II.1	Natural gas annual combustion limit	Not evaluated	The facility has yet to keep records of natural gas combusted per SC VI.1(j). They plan to work with their utility provider for this information.
III.1	Fugitive dust control program	Compliance	The facility provided a fugitive dust control program to AQD during the inspection. AQD approved the plan on July 2, 2021.
VI.1(a)	Iron & steel processing from FG-DRYERCRUSHER	Compliance	Monthly and 12-month records were provided from beginning of operation in October of 2020 through April of 2021.
VI.1(b)	Iron & steel processing from EU-MAGSEPARATOR	Compliance	EU-MAGSEPARATOR has not begun operation at this point.
VI.1(c)	Iron & steel processing from EU-REPUBLICLINE	Compliance	Monthly and 12-month records were provided from beginning of operation in October of 2020 through April of 2021.
VI.1(d)	Iron & steel processing from EU-IRONSCREENER	Compliance	Monthly records were provided from beginning of operation in April of 2021. Talking with Mr. Fuller and Mr. Robison, EU-IRONSCREENER is Screener #3 on the throughput records.
VI.1(e)	Iron & steel processing from FG-IRONLINE	Compliance	FG-IRONLINE is comprised of EU-MAGSEPARATOR, EU-REPUBLICLINE, EU-IRONSCREENER, and EU-BLUELINE. EU-BLUELINE has not started operation.
VI.1(f)	Iron & steel processing from FG-MELT	Compliance	Melt records were provided via email by Mr. Fuller on July 15, 2021 in response to a violation notice issued June 24, 2021.
VI.1(g)	Iron & steel processing from EU-CRUSHINGLINE	Compliance	Monthly and 12-month records for Roll Crusher were provided from beginning of operation of in December of 2020 through April of 2021.
VI.1(h)	Iron & steel processing from EU-ASPDYSEG1 and EU-ASPDYSEG2	Compliance	Melt records were provided via email by Mr. Fuller on July 15, 2021 in response to a violation notice issued June 24, 2021. East and west as indicated on the records indicate EU-ASPDYSEG1 or EU-ASPDYSEG2. All material from FG-MELT continues onto either EU-ASPDYSEG1 or EU-ASPDYSEG2.
VI.1(i)		Compliance	According to Mr. Fuller and Mr. Robison, EU-FINISHINGLINE is Screener #1 and Screener #2

SC(s)	Brief Condition Summary	Determination	Explanation
	Iron & steel processing from EU-FINISHINGLINE		on the facility recordkeeping page. Monthly records were provided from beginning of operation in January of 2021 through April of 2021.
VI.1(j)	Natural gas monthly and 12-month rolling combustion records	Non-compliance	The facility has yet to keep records of natural gas combusted per SC VI.1(j). They plan to work with their utility provider to acquire this information.
VI.1(k)	PM, PM10, and PM2.5 monthly and 12-month rolling emissions records	Non-compliance	Appendix A talks about calculating PM, PM10, and PM2.5 emissions from material throughput. The facility has not established emission factors at this point, so does not have a record of emissions.
VI.1(l)	NO _x , CO, VOCs, individual HAPs, and aggregate HAPs monthly and 12-month rolling emissions records	Non-compliance	The facility did not provide a record of these emissions.
VI.1(m) (i-iii)	A record of visible emissions readings	Compliance	Visible emissions readings records were provided for FG-MELT, FG-DRYERCRUSHER, FG-MILLS, FG-PLANTBH, and EU-REPUBLIC. Mr. Robison plans to add time to the records in addition to the observation date.

NESHAP ZZZZZ Applicability

40 CFR Part 63 Subpart ZZZZZ - National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources (Subpart 5Z) applies to each new or existing iron and steel foundry. You are subject to this subpart if you own or operate an iron and steel foundry that is an area source of hazardous air pollutant (HAP) emissions. Peerless is an area source of HAPs. However, because Peerless does not pour molten metal into molds, it does not appear to meet the definition of an iron and steel foundry per paragraph 63.10906 of Subpart 5Z.

The AQD EvalForm for PTI No. 34-19A states (emphasis from the EvalForm),

The definition of Iron and Steel Foundry under 40 CFR 63.10906 is as follows:

Iron and steel foundry means a facility or portion of a facility that melts scrap, ingot, and/or other forms of iron and/or steel and pours the resulting molten metal into molds to produce final or near final shape products for introduction into commerce. Research and development facilities, operations that only produce non-commercial castings, and operations associated with nonferrous metal production are not included in this definition.

Peerless' melting operation will not pour molten metal into molds. Their process will aspirate the molten metal using high pressure water through a nozzle to produce fine particles. The particles are then dried, size segregated, and further processed.

Miscellaneous Equipment

Metallurgical Lab

Metals received have to meet environmental standards. According to Mr. Fuller, every load received undergoes a chemistry analysis for lead, selenium, boron, chrome, and other metals. The facility provided an example metallurgical analysis. The facility final product has to meet SAE specifications. They sell to those standards.

The lab appears to be exempt from obtaining a permit per Rule 283(2)(b) for laboratory equipment.

Emergency Generator

The facility has one natural gas-fired emergency generator on site. It is planned to be used for the hardening and retort furnaces. It appeared to be an older unit that is not currently hooked up to natural gas. Peerless explained that it will be rehabbed. I could not locate a manufacture date on its nameplate. AQD did not evaluate whether the engine was manufactured after a date that would make the engine subject to 40 CFR Part 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

The engine appears to be exempt from obtaining a PTI per Rule 285(2)(g) for internal combustion engines that have a maximum heat input less than 10 million British thermal units per hour.

Diesel Above-Ground Storage Tank


Peerless has one 500 gallon above-ground diesel storage tank for forklifts on site. The tank is double walled. On July 19, 2021, Mr. Robison provided the safety data sheet for the diesel fuel. The storage tank appears to be exempt from obtaining a PTI per Rule 284(2)(d) for the storage of no. 2 fuel oil.

Stormwater Retention Pond

The facility has a stormwater retention pond. The collected water feeds the aspirating and air quenching activities. This does not appear to be an air quality concern.

Conclusion

Peerless is not operating in compliance with all applicable requirements. The facility has been operating for less than a year, and no visible emissions were observed from its eight new baghouses on site. While the site is clean, and emissions are likely below thresholds since the plant is not operating at capacity, there are deficiencies in recordkeeping that need to be addressed. The facility received a violation on June 24, 2021. They are working to resolve remaining recordkeeping issues.

NAME  DATE 8/6/21 SUPERVISOR JK