

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Real Alloy	SRN : N5957
Location : 267 N. Fillmore Rd	District : Kalamazoo
	County : BRANCH
City : COLDWATER State: MI Zip Code : 49036	Compliance Status : Compliance
Source Class : MAJOR	Staff : Rex Lane
FCE Begin Date : 8/15/2015	FCE Completion Date : 8/15/2016
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/03/2016	Self Initiated Inspection	Compliance	Self-Initiated Inspection
05/25/2016	MAERS	Compliance	MAERS ROP Certification Report and Audit: Previous year emission comparison report matched reasonably well for material throughput versus emissions reported in audit report. No additions or removals were noted on the respective audit reports. Staff uploaded stack testing spreadsheet for testing conducted in 2012 and 2013 for South Plant that was emailed to staff on 5/20/16 by Ms. Janine Grossheim, Real Alloy. -RIL
05/25/2016	MAERS	Compliance	MAERS ROP Certification Report and Audit: Previous year emission comparison report matched reasonably well for material throughput versus emissions reported in audit report. No additions or removals were noted on the respective audit reports. Staff uploaded stack testing spreadsheet for testing conducted in 2012 and 2013 for South Plant that was emailed to staff on 5/20/16 by Ms. Janine Grossheim, Real Alloy. -RIL

Activity Date	Activity Type	Compliance Status	Comments
03/31/2016	ROP Annual Cert	Compliance	<p>ROP Annual Compliance Certification Report: 1/1/15 - 12/31/15</p> <p>Report contains an original dated signature by the ROP section responsible official. The facility reported one deviation that was previously reported under their MACT semi-annual excess emissions/summary report for the time period 7/1/15 - 12/31/15 required under 40 CFR 63.1516 (b). The report identified an excess emissions event that occurred on 9/8/15 for approximately 165 minutes on EUALDRYER3 which was 0.074% of total operating time during the reporting period. Torit # 2 exceeded the inlet temperature limit of 403 degrees F (actual temperature 412 degrees F) due to poor charge material. The facility's corrective action included stopping production and checking the inlet air damper system. A violation notice will not be sent at this time due to reported excess emissions event due to its brevity and corrective measures taken by the facility. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
03/31/2016	ROP SEMI 2 CERT	Compliance	<p>ROP Semi-annual Compliance Certification Report: 7/1/15 - 12/31/15</p> <p>Report contains an original dated signature by the ROP section responsible official. The facility reported one deviation that was previously reported under their MACT semi-annual excess emissions/summary report for the time period 7/1/15 - 12/31/15 required under 40 CFR 63.1516 (b). The report identified an excess emissions event that occurred on 9/8/15 for approximately 165 minutes on EUALDRYER3 which was 0.074% of total operating time during the reporting period. Torit # 2 exceeded the inlet temperature limit of 403 degrees F (actual temperature 412 degrees F) due to poor charge material. The facility's corrective action included stopping production and checking the inlet air damper system. A violation notice will not be sent at this time due to reported excess emissions event due to its brevity and corrective measures taken by the facility. -RIL</p>
03/31/2016	ROP Annual Cert	Compliance	<p>ROP Annual Compliance Certification Report: 1/1/15 - 12/31/15</p> <p>Report contains an original dated signature by the ROP section responsible official. Report states that there were no deviation from ROP terms and conditions during the reporting period.</p>
03/31/2016	ROP SEMI 2 CERT	Compliance	<p>ROP Semi-annual Compliance Certification Report: 7/1/15 - 12/31/15</p> <p>Report contains an original dated signature by the ROP section responsible official. Report states that there were no deviation from ROP terms and conditions during the reporting period.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/31/2016	CO/CJ	Compliance	<p>Semi-annual report for Consent Order #35-2014</p> <p>Report contains an original dated signature by the section responsible official. Report contains an updated table on compliance status with Consent Order No. 35-2014, Paragraphs 9.A.1 through 9.C.1.</p>
03/31/2016	CO/CJ	Compliance	<p>Semi-annual report for Consent Order #35-2014</p> <p>Report contains an original dated signature by the section responsible official. Report contains an updated table on compliance status with Consent Order No. 35-2014, Paragraphs 9.A.1 through 9.C.1.</p>
03/03/2016	Meeting Notes	Compliance	<p>Coldwater North Plant: Reveratory Furnace Flue Project</p> <p>Coldwater South Plant: Dross processing in Rotary Furnaces</p>
02/22/2016	Telephone Notes		<p>EUALFURN7-S1 and EUALFURN8-S1 (Flue Stacks: SVALFURN7-S1 and SVALFURN8-S1): Testing Status</p>

Activity Date	Activity Type	Compliance Status	Comments
02/18/2016	MACT (Part 63)	Compliance	<p>Semi-annual Excess Emissions/Summary Report - Real Alloy Recycling (267 North Fillmore Road)</p> <p>An ROP certification report that contains an original dated signature by the responsible official was included with the MACT report. The MACT report covers the semi-annual excess emissions/summary report for the time period 7/1/15 - 12/31/15 required under 40 CFR 63.1516 (b). The MACT report also includes the annual compliance certification report for CY 2015 required under 40 CFR 63.1516 (c). The report states that there were no periods of excess emissions; no periods where CMS was inoperative and no identified SSM events for process control equipment. Broken bag detectors and thermo-couples were certified/audited during the semi-annual reporting period for MACT subject process equipment. The report certifies that the furnace molten level remained above the hearth archway during the reporting period. The report also certifies that aluminum scrap/dross utilized in an emission test in which emission limits specified in 63.1505 were exceeded has not been processed since submittal of the revised OM&M plan containing the material prohibition. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
02/18/2016	MACT (Part 63)	Compliance	<p>Semi-annual Excess Emissions/Summary Report - Real Alloy Specifications (368 W. Garfield)</p> <p>An ROP certification report that contains an original dated signature by the responsible official was included with the MACT report. The MACT report covers the semi-annual excess emissions/summary report for the time period 7/1/15 - 12/31/15 required under 40 CFR 63.1516 (b). The MACT report also includes the annual compliance certification report for CY 2015 required under 40 CFR 63.1516 (c). The report identified an excess emissions event that occurred on 9/8/15 for approximately 165 minutes on EUALDRYER3 which was 0.074% of total operating time during the reporting period. Torit # 2 exceeded the inlet temperature limit of 403 degrees F (actual temperature 412 degrees F) due to poor charge material. The facility's corrective action included stopping production and checking the inlet air dampering system. The report states that there were no periods where CMS was inoperative and no identified SSM events for process control equipment. Broken bag detectors and thermo-couples were certified/audited during the semi-annual reporting period for MACT subject process equipment. Table 4 of the report identified the thermocouple for Baghouse # 2 was down 0.051% and Torit # 2 thermocouple was down 0.181% of total source operating time. The report certifies that the furnace molten level remained above the hearth archway during the reporting period. A violation notice will not be sent at this time due to reported excess emissions event due to its brevity and corrective measures taken by the facility. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
02/17/2016	Stack Test	Compliance	<p>Rotary Furnace Stack Test: PM2.5 and PM10</p> <p>Test report was received on 1/27/16. Staff contacted facility and requested submittal of ROP certification report for test report which was received on 2/9/16.</p> <p>Each test run consisted of simultaneous operation of Rotary Furnaces # 1 and # 2 for two heat cycles (i.e. three hour heats; six hour runs) while processing Honda 380 dross. Per report summary, the average feed rate per furnace was 10,610 lbs./hour; lime injection rate was 338 lbs./hour and trona injection rate above the furnace hood was 90 lbs./hour. The furnace feed rate, lime and trona injection rates were all similar to past stack testing events for this process equipment. The average PM2.5 emission rate during testing was 0.141 lbs./ton feed charge which is 48% of the allowable limit (0.292 lbs./ton feed charge). The average PM10 emission rate during testing was 0.160 lbs./ton feed charge which is 22% of the allowable limit (0.737 lbs./ton feed charge). AQD -TPU reviewed the test report and found that the results were acceptable (2/12/16 memo attached). See staff's 12/16/15 test observation report for further information on new oxy-fuel burner system that was installed on the rotary furnaces and four additional modules that were added to the rotary furnace baghouse. -RIL</p>

02/10/2016	Stack Test	Compliance	<p>Furnace # 7 Emission Test: PM, PM10 and HCL</p> <p>On January 4, 2016, test report was received from Real Alloy Specification (North plant) for PM, PM10 and HCL testing of Reveratory Furnace # 7 flue testing completed in November 2015. Report contained test data for Test Runs # 1, # 3 and # 4 but did not include results for Test Run # 2 that was apparently voided by the facility. On 1/20/16, staff requested process data inputs and emission summary data for Test Run # 2 which was submitted on 1/28/16. Per Real Alloy's response, a blockage in the lime feed system was detected part way through Test Run # 2 and once cleared, the facility increased the lime rate from 20 to 33 pounds/hour for the remainder of this run and subsequent two test runs. AQD staff (Rex Lane) requested AQD-Technical Programs Unit (TPU) review of the test report on 1/20/16 due to the high variability in results for PM10 and the average of Test Runs # 1, # 3 and # 4 being 85% of the allowable emission limit. AQD-TPU completed a review of the test report on 2/4/16 and their analytical results were similar to those listed Table 2-1 of the test report.</p> <p>On 2/4/16, staff contacted Mr. Jeff Ferg, Real Alloy and requested that the facility retest Furnace # 7 flue for PM10 and HCL during the planned test the week of March 21st 2016 of Furnace # 8 flue. The retest request was due the large variability in PM10 results between the four test runs and 85% of limit average (if Test Run # 2 results excluded); the change/increase in lime feed rate between and across test runs during November 2015 testing; replacement of the temporary lime injection system with a permanent system along with installation of air cooler bypass ductwork which may result in differences in testing conditions for Flues 7 and 8; and chlorine gas injection rates for Test Runs # 3 and # 4 were 20%</p>
------------	------------	------------	---

02/10/2016	Stack Test	Compliance	and 30% below the planned target rate. Mr. Ferg agreed to retest Furnace Flue # 7 with Furnace Flue # 8 following transmittal of the agency's request. ROP certification report was submitted after the fact for this test report that was received on 2/9/16 that contains an original dated signature by the responsible official for the North plant. -RIL
12/16/2015	Stack Test Observation	Unknown	Rotary Furnace PM10 and PM2.5 Emission Test - Processing Honda Dross
11/16/2015	Telephone Notes		Performance Test: EUALFURN7 and EUALFURN8 Flues
11/10/2015	Stack Test Observation		EUALFURN7 Flue Emission Test
10/09/2015	Telephone Notes		Construction Status under PTI No. 110-15
10/05/2015	ROP Semi 1 Cert	Compliance	ROP Semi-annual Certification Report - Real Alloy Specification (North Plant) Report is signed and dated by the facility responsible official. Report states that there were no deviations during the reporting period. -RIL
10/05/2015	ROP Semi 1 Cert	Compliance	ROP Semi-annual Certification Report - Real Alloy Recycling (South Plant) Report is signed and dated by the facility responsible official. Report states that there were no deviations during the reporting period. -RIL

Activity Date	Activity Type	Compliance Status	Comments
10/05/2015	MACT (Part 63)	Compliance	<p>MACT Semi-annual Excess Emissions/Summary and Annual Compliance Certification Report (North Plant - Real Alloy Specification, Inc.)</p> <p>Report is signed and dated by the facility responsible official. The report states that there were no excess emissions or CMS downtime during the reporting period (63.1516(b)). The report also includes an annual MACT compliance certification report under 40 CFR 63.1516(c) which states that any period of excess emissions that occurred during the year were reported and that all monitoring, reporting and recordkeeping requirements were met during the year. -RIL</p>
10/05/2015	MACT (Part 63)	Compliance	<p>MACT Semi-annual Excess Emissions/Summary and Annual Compliance Certification Report (South Plant - Real Alloy Recycling, Inc.)</p> <p>Report is signed and dated by the facility responsible official. The report states that there were no excess emissions or CMS downtime during the reporting period (63.1516(b)). The report also includes an annual MACT compliance certification report under 40 CFR 63.1516(c) which states that any period of excess emissions that occurred during the year were reported and that all monitoring, reporting and recordkeeping requirements were met during the year. -RIL</p>

Name: RIL

Date: 8/15/16

Supervisor: MO8/16/2016