

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Real Alloy Recycling, LLC	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 : Amanda Chapel
FCE Begin Date : 9/15/19	FCE Completion Date : 9/15/2021
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/24/2021	On-site Inspection	Compliance	
08/23/2021	MAERS	Compliance	The facility submitted a signed and dated ROP certification form to accompany the MAERS supplemental control template, as required by this MAERS cycle.
07/13/2021	ROP Other	Unknown	Facility submitted an SVALFURN1 stack change notification completed on 7-6-21. Special Condition IX.1 and IX.2 of PTI 63-19A require that the facility comply with stack parameters for SVALFURN1 within 9 months of issuance of the permit and shall notify the AQD District Supervisor when the stack change is complete. The permittee submitted the stack change notification on July 12, 2021.
04/13/2021	Excess Emissions (CEM)	Compliance	Facility submitted a signed ROP certification form with original signature and date. Facility reports that during the entire reporting period, there were no excess emissions or exceedances.
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Activity Date	Activity Type	Compliance Status	Comments
04/13/2021	ROP Annual Cert	Compliance	Facility submitted a signed ROP certification with original signature and date. Facility states they were in compliance with all terms and conditions except during the deviations identified in the deviation report. No additional deviations were included with this report.
04/13/2021	ROP SEMI 2 CERT	Compliance	Facility submitted a signed ROP certification form with original signature and date. Facility reports that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or other terms or conditions occurred.
04/13/2021	ROP Annual Cert	Compliance	Facility submitted a signed ROP certification form with original signature and date. Facility reports that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or other terms or conditions occurred.
04/13/2021	ROP SEMI 2 CERT	Compliance	Facility submitted a signed ROP certification form with original signature and date. Facility reports that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or other terms or conditions occurred.
04/03/2020	MAERS	Compliance	The documentation submitted with the MAERS report appears to justify the emissions reported for the 2019 reporting season.
04/03/2020	ROP Annual Cert		The facility submitted their ROP Annual certification with an original signature and date from the responsible official. They indicated that during the entire reporting period, they were in compliance with all conditions contained within the permit except the during the identified times.

Activity Date	Activity Type	Compliance Status	Comments
04/03/2020	ROP SEMI 2 CERT		<p>The facility submitted their ROP Semi-Annual certification with an original signature and date from the responsible official. They indicated that during the entire reporting period, the were in compliance with all conditions contained within the permit except the during the identified times. EUIMDRYER Torit 3 Baghouse exceeded the inlet temperature 14 times between 7/1/19 and 8/2/19 with the highest exceedance being 126 degrees for 180 minutes due to high ambient temperatures and poor quality feed. The facility installed and upgraded monitoring system in processing department.</p>
04/03/2020	ROP Annual Cert		<p>The facility submitted their ROP Annual certification with an original signature and date from the responsible official. They indicated that during the entire reporting period, the were in compliance with all conditions contained within the permit except the during the identified times.</p>
04/03/2020	ROP SEMI 2 CERT		<p>The facility submitted their ROP Semi-Annual certification with an original signature and date from the responsible official. They indicated that during the entire reporting period, the were in compliance with all conditions contained within the permit except the during the identified times. EUIMREVERBFURNACE Reverb Baghouse 3 had 5 exceedances of the 3-hr inlet temperature due to high ambient temperatures or faulty alarm system. EU-IMROTFURN2 exceeded the flux limit of 262 lbs of chlorine/ton 4 times. Highest exceedance was 295.1 lbs/ton CL. Production and documentation records were reviewed.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/06/2020	Excess Emissions (CEM)	Compliance	Real Alloy submitted an excess emissions report with an ROP certification with an original signature which is dated. Real Alloy Recycling LLC reported a total of 12 during the reporting period. The exceedances which were reported are all regarding the Dryer for Torit 3 BH inlet temperature of 118 degrees. Highest exceedance was 126 degrees F. There was no CEMs downtime reported. The percent of operating time which the parameter was exceeded is 0.85% of total time. A violation notice will not be sent at this time.
03/06/2020	Excess Emissions (CEM)	Compliance	Real Alloy submitted an excess emissions report with an ROP certification with an original signature which is dated. Real Alloy Recycling LLC reported a total of 9 during the reporting period. There were 5 exceedances which were reported that the Reverb Baghouse inlet temperature of 118 degrees was exceeded. Highest exceedance was 118 degrees F. Rotary 2S permitted flux limit of 262.0 lbs of chlorine/ton was exceeded 4 times. The highest exceedance was 295.1 lbs of chlorine/ton. There was no CEMs downtime reported. The percent of operating time which the reverb baghouse parameter was exceeded is 0.26% of total time. The percent of operating time which the rotary baghouse exceeded is 0.38%. A violation notice will not be sent at this time.
10/04/2019	Stack Test	Compliance	Emissions Test Report for testing performed on August 22, 2019 for Reverberatory Furnace. The report has an ROP Certification Report with an original signature and date. Results showed the D/F was an average of 0.38 ug TEQ/MG after 3 runs with a limit of 15 ug TEQ/MG which is 3% of the limit. The average baghouse feed rate was 11,807 lb/hr and inlet temperature average was 153 degrees F.

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10/04/2019	MACT (Part 63)		Revised OM&M Plan to include the addition of the August 2019 stack test results.
09/16/2019	Excess Emissions (CEM)	Compliance	Semi-Annual Excess Emissions/Summary Report. Facility submitted an ROP semi-annual certification form with original signature and date from responsible official. Facility reports 4 excess emission events. At no point did the CMS have any downtime.
09/16/2019	Excess Emissions (CEM)		Semi-Annual Excess Emissions/Summary Report. Facility submitted an ROP semi-annual certification form with original signature and date from responsible official. Facility reports 10 incidents of excess emissions. There were no periods where the CMS was down.
09/16/2019	ROP Semi 1 Cert		The facility submitted a deviation report with an original signature dated 9/12/19 by the responsible official. Section 1 reported 4 deviations. On 4/30/19 and 5/27/19, reverb furnace 7 had a flux exceedance due to operator error. Exceedance was 81.9 lbs/ton and 83.9 lbs/ton respectively and limit is 77.9 lbs/ton. Additional training was done with operators. On 6/29/19 and 6/30/19, Torit 3 baghouse exceeded inlet temperature of 118 F due to high ambient temp and poor feed. Actual temp was 119 F and 120F respectively. Installed upgraded monitoring system.

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09/16/2019	ROP Semi 1 Cert		<p>The facility submitted a deviation report with an original signature dated 9/12/19 by the responsible official. Section 2 reported 10 deviations. On 2/12/19 Rotary 1 and Rotary 2 had a flux exceedance. Rotary 1 has a limit of 267.0 lbs chlorine/ton and actual flux was 270 lbs chlorine/ton. Rotary 2 has a limit of 262.0 lbs chlorine/ton and actual flux was 334.2 lbs/ton charged. The e-Heat sheet was revised due to the exceedance. Rotary 2 exceeded on 4/15/19 with a flux amount of 287.0 lbs/ton. On 2/26/19 and 4/29/19 there was a reverb flux exceedance of the limit of 52.8 lbs/ton and the actual flux usage was 66 lbs/ton and 337.4 lbs/ton respectively. On 3/11/19 Rotary 2 had a flux exceedance of 319.2 lbs/ton and the limit is 262.0 lbs/ton. The reverb baghouse had 3-hour inlet temperature exceedances on 3/14/19 three separate times and 6/28/19. The limit is 112F and the exceedances were 117F, 124F, 115F, and 115F.</p>

Name: Amber Chapel Date: 9/15/21

Supervisor: R/L 9/20/21