

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 Cross
FCE Begin Date : 1/1/22	FCE Completion Date : 7/17/2023
Comments : Facility is addressing the outstanding VN on lapsed 5-year testing by completing stack testing in July/August 2023.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/11/2023	Stack Test Observation	Unknown	
06/15/2023	On-site Inspection	Compliance	
04/12/2023	MAERS	Compliance	The facility submitted their annual MAERS report on 3/16/23. This report was audited by EGLE staff on 4/12/23. The emissions reported were determined to appear accurate, based on emissions reported in previous years and operations at the facility. The MAERS report was passed after review of the reported emissions and attached supporting documentation.
04/04/2023	ROP SEMI 2 CERT	Compliance	The facility submitted an ROP Certification form with an original signature and date of a responsible official. The 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 any other terms of conditions occurred.

Activity Date	Activity Type	Compliance Status	Comments
04/04/2023	ROP Annual Cert	Non Compliance	<p>The facility submitted an ROP Certification form with an original signature and date of a responsible official.</p> <p>The facility reports that during the entire reporting period, this source was in compliance with all terms and conditions contained in the ROP, except for the deviations identified on the enclosed deviation reports.</p> <p>Deviation is reported as a stack testing date deviation. EUIMROTFURN1/2 missed the 5 year stack testing deadline as of 10/12/22. Conflicting stack testing provisions and Real Alloy's interpretation regarding relevant stack testing deadlines for source EUIMROTFURN1/2, when comparing to the former ROP (2016), PTI (2106), and recently issued ROP (2022), resulted in a missed testing deadline. Real Alloy has requested enforcement discretion from EGLE in a letter dated 2/28/23. testing is scheduled for July 2023.</p> <p>A VN will be sent for this lapse in testing.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/04/2023	Excess Emissions (CEM)		<p>Semi-Annual Excess Emissions Summary Report</p> <p>The facility submitted an ROP certification form with original signature from responsible official and date. The facility reported 12 bag break alarms on Torit 2 and Torit 8 that required replacement. In all cases, the bag permeability was good. It is believed that the alarm was acknowledged but not properly documented when acknowledged in the ignition software. There were no visible emissions during these events. This constituted a parameter monitoring exceedance but no excess emissions were reported. The facility also reported that the CMS was not out of control at any of these times.</p> <p>The percent of operating time during which parameter exceedances occurred totaled 1.5% of total operating time.</p>
04/04/2023	ROP SEMI 2 CERT	Non Compliance	<p>The facility submitted an ROP Certification form with an original signature and date of a responsible official.</p> <p>The 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 any other terms of conditions occurred.</p> <p>The facility reported a deviation on their Annual Certification from October 2022 regarding a lapsed stack testing date. There were no deviations from monitoring or recordkeeping requirements but there was a deviation from the condition requiring subsequent five year stack tests. This is described in detail in the ROP Annual Certification.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/22/2022	ROP Semi 1 Cert	Compliance	The facility submitted an ROP certification form with original signature from responsible official and date. The facility certifies that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
09/22/2022	Excess Emissions (CEM)	Compliance	Semi-Annual Excess Emissions Summary Report The facility submitted an ROP certification form with original signature from responsible official and date. The facility reported that for 3 hours on 2/9/22 and 3 hours on 5/31/22, they exceeded the rotary baghouse inlet temperature average exceeded 221F due to weather. The operator idled the barrels to lower the temperature and training was conducted. The CMS was not out of control during the reporting period.
09/22/2022	ROP Semi 1 Cert	Compliance	The facility submitted an ROP certification form with original signature from responsible official and date. The facility certifies that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

Activity Date	Activity Type	Compliance Status	Comments
09/22/2022	ROP Semi 1 Cert	Compliance	The facility submitted an ROP certification form with original signature from responsible official and date. The facility reported four deviations. One deviation on 3/30/22 for a 3 hour temperature average exceedance of 169F due to slightly oily extrusions. Air was added to dilute the oily turnings and the temperature reduced. There were 3 exceedances on 4/2/22, 4/5/22, and 5/8/22 for a BLD alarm on the Torit 2 baghouse. The broken bag was replaced and no visible emissions were observed during the events and they lasted about 2 hours or less each time. The facility certifies that the CMS was never inoperative and total process operating time is 176 days.
03/22/2022	ROP Annual Cert	Compliance	The facility submitted an ROP certification form with original signature and date. The facility certified that during the entire reporting period, the source was in compliance with all terms and conditions in the ROP except for the deviations reported. All deviations occurred in the first semi-annual reporting period and have been previously addressed.
03/22/2022	ROP SEMI 2 CERT	Compliance	The facility submitted an ROP certification form with original signature and date. The facility certified that during the entire reporting period, the source was in compliance with all monitoring and recordkeeping requirements contained in the ROP.
03/22/2022	ROP SEMI 2 CERT	Compliance	The facility submitted an ROP certification form with original signature and date. The facility certified that during the entire reporting period, the source was in compliance with all monitoring and recordkeeping requirements contained in the ROP.

Activity Date	Activity Type	Compliance Status	Comments
03/22/2022	Excess Emissions (CEM)	Compliance	The facility submitted an ROP certification form with original signature and date. The facility reported that a parameter monitoring exceedance occurred on 10/28/21 during an 8 hour time period where an 8-hour baghouse inspection was missed during major equipment breakdown. During the reporting period, there was no period during which this CMS system was inoperative.
03/22/2022	Excess Emissions (CEM)	Compliance	The facility submitted an ROP certification form with original signature and date. The facility reports 7 parameter monitoring exceedances four for BLD alarms cause by dirty probes. There were no emissions and the alarm was acknowledged. The sensors were cleaned and the alarms stopped. Three alarms were attributed to a lime flow alarm. The lime flow lines were cleaned and the alarm was addressed. At no point was the CMS inoperative.

Name: Amanda Cross

Date: 7/17/23

Supervisor: Monica Brothers