DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N595736000

FACILITY: Real Alloy		**SRN / ID:** N5957
LOCATION: 267 N. Fillmore Rd, COLDWATER		**DISTRICT:** Kalamazoo
CITY: COLDWATER		**COUNTY:** BRANCH
CONTACT: Janine Grossheim , Supvr. Quality & Environmental Management		**ACTIVITY DATE:** 08/03/2016
STAFF: Rex Lane	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Self-Initiated Inspection		
RESOLVED COMPLAINTS:		

Facility Description:

Real Alloy, Inc. (N5957) consists of two secondary aluminum plants, Real Alloy Specification, Inc. located at 368 Garfield Avenue and Real Alloy Recycling, Inc. located at 267 N. Fillmore Road, Coldwater, MI. These plants constitute a single stationary source that has the potential to emit nitrogen oxides, particulate matter less than 10 microns (PM10) and hazardous air pollutants above respective major source threshold levels and is currently permitted under Renewable Operating Permit (ROP) No. MI-ROP-N5957-2012e. The source is also subject to Prevention of Significant Deterioration (PSD) regulations per 40 CFR Part 52.21 for particulate matter. The facility is also subject to the requirements of administrative consent order No. 35-2014 that was effective on 6/4/14.

The source also operates certain process equipment that is subject to major source requirements of the Secondary Aluminum Production NESHAP, 40 CFR Part 63, Subpart RRR, as follows:

Real Alloy Specification – ROP Section 1 (aka North Plant):

EUALDRYER3-S1 – 15,000 pound/hour aluminum chip dryer
EUALSHREDDER-S1 – 25,000 pound/hour aluminum crusher/shredder
EUALFURN1-S1 – 18,000 pound/hour reverberatory melting furnace
EUALFURN2-S1 – 120,000 pound reverberatory holding furnace (Group 2 operation)
EUALFURN7-S1 – 9,000 pound/hour reverberatory melting furnace
EUALFURN8-S1 – 8,000 pound/hour reverberatory melting furnace

Real Alloy Recycling – ROP Section 2 (aka South Plant):

EUIMDRYER-S2 – 20,000 pound/hour aluminum scrap dryer (last operated Dec. 2008)
EUIMREVERBFURN-S2 – 15,000 pound/hour reverberatory melting furnace (Furnace 7S)
EUIMROTFURN1-S2 – 21,000 pound/hour rotary melting furnace
EUIMROTFURN2-S2 – 21,000 pound/hour rotary melting furnace

Compliance Evaluation:

On August 3, 2016, AQD staff (Rex Lane) conducted an unannounced air quality inspection at Real Alloy Specification (RAS) and Real Alloy Recycling (RAR) to determine compliance with 40 CFR Part 63, Subpart RRR, MI-ROP-N5957-2012e and Air Pollution Control Rules. Staff made contact with Ms. Janine Grossheim, Environmental Manager for both plants, stated the purpose of this visit and provided her with staff credentials and a copy of MDEQ's inspection brochure. Additional Real Alloy personnel involved during either the inspection or post-inspection discussion were Mr. Brady Myers, Regional HSE Manager; Mr. Gregory Hall, North

Plant Manager; Mr. Ivan Roslak, CI Manager and maintenance personnel for both the North and South plants.

Staff's visitor/contractor training pass was issued by Real Alloy on December 16, 2015 and is valid for one year. Required PPE includes foam lined safety glasses, hearing protection, hard hat; long sleeve shirt and all jewelry must be removed or taped over.

Prior to the inspection, we discussed the status of the ROP renewal application and the 9/14/16 submission deadline. Staff also notified Ms. Grossheim and Mr. Myers that most of the General Condition 13 testing language in the current ROP will be replaced with a one-time emission testing requirement during the next ROP renewal permit issuance period. This change is based on USEPA comments received during their 45-day review period for recently drafted ROPs statewide. During the inspection, the following processes were observed:

Real Alloy Specification:

EUALDRYER3-S1:

Process emissions from the chip dryer are routed to an afterburner, cyclone and 43,000 cfm baghouse (Torit # 2). Dryer drum seals are controlled by a 34,000 cfm baghouse (Torit # 3) that also control EUALSHREDDER-S1. Emission test to determine compliance with ROP and NESHAP emission limitations was completed on 7/9/13. Process was in operation during the inspection and staff observed the dryer discharge chute and it appeared to consist of only unpainted aluminum chips and the afterburner bypass cap was down. The dryer drum and afterburner temperature was 900 and 1505 degrees F, respectively. The baghouse inlet temperature was 393 degrees F and the differential pressure was 4.8". The current bag leak detection (BLD) reading was 0.87% with a BLD set point of 7% with an alarm delay of 46 seconds. The BLD system was last calibrated on 7/5/16. On a monthly basis, the facility performs a BLD response test, electronic drift test and probe cleaning on all control equipment equipped with BLD equipment. The most recent calibration date for the afterburner thermocouple was 6/18/16. Baghouse draft fan RPM was last calibrated on 6/18/16. The feed scale for the dryer was last calibrated on 5/16/16. Maintenance staff records the presence of visible emissions and baghouse pressure drop every four hours and staff reviewed recent records.

Facility certified in their most recent semi-annual NESHAP excess emissions/summary report that only unpainted aluminum chips are used as feedstock in the chip dryer. Staff reviewed records that indicate compliance with 12-month rolling time period emission and material throughput limitations. Facility is also tracking dryer malfunction events where the permittee may vent emissions through control bypass not to exceed 80 hours per year (current value – 1.26 hours). The most recent annual MACT inspection of the afterburner controls occurred on 11/17/15 (copy attached).

During the post-inspection discussion with Messrs. Myers and Hall, staff noted that they had observed fugitive emissions from the south dryer drum seal during dryer operation while on the crusher load floor. Mr. Hall stated that the south dryer seal is scheduled to be replaced on 8/15/16 and the north dryer seal is scheduled to be replaced in September. Per Mr. Hall, their supplier convinced them to try a fabric type seal which has not lasted as long as projected so they are returning to fabricated metal seals.

EUALSHREDDER-S1:

Process emissions from the crusher/shredder are routed to a 34,000 cfm baghouse (Torit # 3) equipped with a BLD system. Emission test to determine compliance with ROP and NESHAP

emission limitations was completed on 7/9/13. Feed/charge scale for the aluminum shredder had an attached outdated calibration sticker (8/6/15) but staff confirmed during the post-inspection review of records that it was last calibrated on 6/18/16. Process was in operation at the time of the inspection and no visible emissions were observed from the baghouse stack. The process was temporarily stopped so that staff could walk up on the feed floor. The baghouse inlet temperature was 122 degrees F and the differential pressure was 5.1". The current bag leak detection (BLD) reading was 0.11% with a BLD set point of 8% with an alarm delay of 43 seconds. The BLD was last calibrated on 7/5/16 and the draft fan RPM on 6/18/16. Staff reviewed records that indicate compliance with 12-month rolling time period emission and material throughput limitations. The last annual capture and control system inspection report was done on 8/12/15 (copy attached).

EUALDROSS-S1:

Process emissions from dross material handling and load out are controlled by a 50,000 cfm baghouse (Torit # 1). Torit # 1 is not equipped with a BLD system. Process was not in operation during initial observation, however the baghouse was running. No visible emissions were observed from the baghouse stack and the differential pressure reading was 1.7". Maintenance staff records the presence of visible emissions and baghouse pressure drop every four hours and staff reviewed recent records. Staff later observed loading of dross into a tractor trailer and some of the generated dust traveled towards the east wall equipped with general ventilation fans rather than into the overhead collection hoods. Staff informed Messrs. Myers and Hall during the post-inspection discussion of their dust observations and that some of the fabric curtains that hang down from the collection hood were either torn or missing and needed to be replaced. Mr. Hall stated that a maintenance order would be written to make necessary repairs.

EUALCRUCIBLES-S1:

Ten natural gas-fired holding crucibles used to transport molten aluminum off-site. Three crucibles were being fired during the inspection. Staff reviewed records that track monthly gas usage and records that show compliance with the 12-month rolling time period NOX emission limitations.

FGALFURN1/2/7/8-S1:

Flexible group consists of three reverberatory secondary aluminum melt furnaces (EUALFURN1, EUALFURN7 and EUALFURN8) and a holding furnace EUALFURN2. Process emissions from furnaces EUALFURN1 and EUALFURN2 vent to a lime injected 65,000 cfm baghouse # 2 (North; stack height 95') equipped with a BLD system. Process emissions from EUALFURN7 and EUALFURN8 vent to a lime injected 60,000 cfm baghouse #1 (South; stack height 61.3') equipped with a BLD system.

Emission testing was conducted on all four furnaces and their respective hearth flues (i.e. SV ID) between September 11th and 13th, 2013 for compliance with ROP and NESHAP emission limitations. SVALFURN7 and SVALFURN8 test results for PM10 did not show compliance with their respective pound/ton of feed charge emission limits (Condition I.51 and I.63). The facility has entered into AQD administrative Consent Order No. 35-2014 to address these emission exceedances. Several other parameters tested between 92 – 97% of their respective emission limits including HCL (I.1) and PM10 (I.9) for EUALFURN1; PM10 (I.37)

for SVALFURN1; and HCL (I.57) for SVALFURN8.

A minor modification to ROP MI-ROP-N5957-2012d was approved on 4/29/16 to incorporate permit to install No. 110-15 to allow flue gas emissions from EUALFURN7 and EUALFURN8 to be rerouted to individual air coolers and lime injected baghouses equipped with BLD with final discharge through a common stack (95' agl). The intent of this modification is to control PM10 emissions below permit limitations. Emission testing was completed the week of July 25th 2016 and results are pending.

During the inspection, all furnaces appeared to be in operation. Furnace # 1 was running 319 alloy and was last tapped at 3 a.m. with a heel depth of 24". Furnace # 7 was running 380 alloy and was last tapped prior to 4 a.m. with a heel depth of 21". Furnace # 8 was running 319 alloy and the last heat ended at 7 a.m. with a heel depth of 21".

NESHAP labels for all reverberatory furnaces were located on the production floor and appeared to be in good shape and reflected the most recent performance test. Staff noted that fugitive emissions from hot dross pans set proximate to recently tapped Furnace # 8 were not being fully captured by its air curtain and charge hood system and this was discussed during the post-inspection meeting with Messrs. Myers and Hall. They indicated that a newer employee was running the loader and set the pans farther away from the furnace than typical and he would be retrained. The drop curtains for Furnace # 8 are also scheduled to be replaced by mid-August. The furnace feed scale was last calibrated on 5/16/16.

For baghouse #1, the current bag leak detection (BLD) reading was 0.21% with a BLD set point of 3% with an alarm delay of 101 seconds. The 3-hour average baghouse inlet temperature was 112 degrees F and the lime feed setting was 3.75 which comply with operating conditions established during the most recent performance test. No visible emissions were noted from the stack during a brief observation. The BLD and thermocouple were last calibrated on 7/5/16 and 7/15/16, respectively. The lime feeder and draft fan RPM were last calibrated on 6/25/16 and 6/18/16, respectively. For baghouse #2, the current bag leak detection (BLD) reading was 0.89% with a BLD set point of 7% with an alarm delay of 61 seconds. The 3-hour average baghouse inlet temperature was 121 degrees F and the lime feed setting was 3.0 which comply with operating conditions established during the most recent performance test. The differential pressure readings for baghouse # 1 and # 2 were 6.5" and 8.6" of water, respectively.

Staff observed the sight glass tube in the lime silo for each baghouse and observed free flowing conditions. During an 11/10/15 visit to the facility, staff observed a lime truck loading the silo and fugitive emissions exiting the top side of the silo and pointed this out to Mr. Jeff Ferg, Corporate HSE. Mr. Myers had maintenance staff come out and explain what happened and what was done to prevent a reoccurrence. Maintenance indicated that the truck operator had overfilled the silo and it isn't equipped with a high level alarm. They have installed a larger 5" diameter vent tube such that if another overfill event were to occur, the vent tube directs the excess lime into the furnace baghouse.

The chlorine room which is in between baghouse # 1 and # 2 is used to store the 2,000 pound liquid chlorine cylinders and evaporator system that is used to supply chlorine gas to EUALFURN1-S1, EUALFURN7-S1 and EUALFURN8-S1 for fluxing and demagging. Chlorine cylinders are weighed continuously to keep track of chlorine usage in each furnace. The four scales were last calibrated on 5/16/16. Scale # 1 and # 2 is used for EUALFURN1-S1. Scale # 3 is used for EUALFURN7-S1. Scale # 4 is used for EUALFURN8-S1. There are three evaporators that are designated to a specific furnace. Evaporator # 1 serves EUALFURN1-S1, evaporator # 2 serves EUALFURN7-S1 and evaporator # 3 serves EUALFURN8-

S1. Chlorine concentrations are continuously monitored inside the room and an alarm will be triggered if it exceeds 0.3 ppm. The reading during the inspection was 0.0 ppm.

Facility certified in their most recent semi-annual NESHAP excess emissions/summary report received 2/9/16 that the molten metal level was maintained above the archway height (i.e. 15") between the charge well and furnace hearth during reactive fluxing and that only clean charge was processed in the Group 2 furnace (EUALFURN2-S2). ACGIH annual capture and collection system inspection records dated 7/10/15 and 7/20/15 for EUALFURN1-S1, EUALFURN7-S1, and EUALFURN8-S1 were provided during the inspection upon staff request. Annual inspections for Furnace 7 and 8 were recently completed on 6/14/16 and staff requested copies of these reports during the post-inspection process period. Staff reviewed records that indicate compliance with 12-month rolling time period emission and material throughput limitations.

FGALBLDG-S1:

Flexible group includes all equipment at the facility, including equipment covered by other permits, grandfathered and exempt equipment. The most recent OM&M plan on file for the North plant was received on 3/16/16. The group 1 and 2 furnace labels were posted and checked during the inspection. Feed/charge scales have been calibrated within the past six months. The last NESHAP semi-annual excess emission/summary report was received by the district office on 2/9/16. Annual ACGIH inspection records for the capture and collection systems appear to be current.

FGALFURN7/8-S1:

Flexible group description allows aluminum scrap charged to EUALFURN7 and EUALFURN8 to contain beryllium up to 5% by weight. According to facility personnel, these furnaces have never charged scrap with any beryllium content. Because more than 18 months have elapsed since PTI No. 33-08A was issued (7/2/08) and subsequently rolled into the ROP, the permit authorization is technically null and void. Therefore, an ROP minor modification application should be filed to remove this flexible group table from the ROP or it will be removed during the ROP renewal process.

FGCOLDCLEANER-S1:

Flexible group is for new cold cleaners placed into operation after 7/1/79. North plant has one cold cleaner located in the maintenance area. The lid was closed but appeared to be missing the operations sticker. The cold cleaner is maintained by Safety Kleen and uses a 100% light petroleum distillate solvent. Staff provided the facility with a replacement MDEQ sticker.

FGALRULE290-S1:

Flexible group is any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290. Staff reviewed fugitive particulate matter emission records for EUALROAD-S1 for previous 12-months which indicate compliance with 1000 pound/month emission limitation.

FGCAM_UNITS-S1:

Flexible group consists of emission units that use a control device to achieve compliance with

a federally enforceable emission limitation or standard for particulate matter. The permittee operates and maintains a BLD system as specified in their OM&M plan for the baghouses associated with EUALDRYER3-S1, EUALFURN1/2/7/8. The BLD system runs a daily zero and span calibration. Any calibration errors will trigger the BLD system to alarm and send an email to management who in turn notify maintenance staff to evaluate system. Per Ms. Grossheim, the furnace and dryer baghouses are equipped with a high inlet temperature audio/visual (blue light) alarm that is tested monthly for functionality by maintenance staff. The facility also has software that looks at predicted 15-minute average and will send an email to her and maintenance staff if inlet temperature may approach limit established in the most recent performance test. The permittee submits a semi-annual report of monitoring, any deviations and/or monitoring downtime during the reporting period.

Real Alloy Recycling:

EUIMDRYER-S2:

A 20,000 pound/hour aluminum scrap dryer. The dryer has a bypass stack that is used only during startup, shutdown and malfunction conditions. The emission unit last operated in December 2008. Therefore, compliance with emission unit permit conditions was not evaluated during this inspection.

EUIMHOTDROSS-S2:

Emission unit consists of salt cake and hot dross handling, storage and load out process that is controlled by a 40,000 cfm baghouse. On March 19, 2016, a large scrap fire consumed the southwest corner of the main process building where the dross processing area is located. Steel siding was being replaced during staff's inspection on an inside wall that had been consumed during this fire. The baghouse controls were damaged during the fire and are currently tagged out. Therefore, compliance with permit requirements was not evaluated during this inspection.

EUIMREVERBFURN-S2 (aka Furnace 7S):

Emission unit consists of a 15,000 pound/hour reverberatory furnace. Emissions from fluxing and melting are controlled by a 70,000 cfm lime-injected baghouse and are exhausted to SVIMDRY/REVERBH. The furnace was idled from December 2008 until its restart on 2/11/13. Performance testing was performed 4/25-26/2013 and demonstrated compliance with NESHAP and ROP emission limitations. Staff reviewed feed/charge and natural gas usage records which indicated compliance with material limits. The furnace was in operation at the time of inspection and tapping to the Deox line follow receipt of molten transfers from the rotary furnaces.

No visible emissions were observed from the baghouse stack during the inspection. The 4-cell pulse jet baghouse differential pressure readings for all cells were pegged past 10" water column upon initial observation. Cell # 1 then went into a cleaning cycle and came back on line at 1.9". The PLC panel showed an overall pressure drop of 7.82". Staff raised their concern (e.g. bag blinding; reduced capture/collection of process emissions) with the high differential pressure readings being observed to Doug, South Plant maintenance

supervisor. Doug noted that the differential pressure tends to run higher on this baghouse. Staff asked if the bags are ever tested for permeability and plant personnel stated that each baghouse undergoes an annual black light and permeability test. Staff requested and received copies following the inspection showing the reverberatory furnace baghouse was last tested in November 2015 and the rotary furnace baghouse in June 2015. The current bag leak detection (BLD) reading was 0.0% with a BLD set point of 5% with an alarm delay of 52 seconds. The 3-hour average baghouse inlet temperature was 108 degrees F and the lime feed setting was 1.0 which complies with operating conditions established during the most recent performance test. The baghouse thermocouple was last calibrated on 3/12/16. Staff observed the lime sight glass in the lime silo for the baghouse and observed free flowing conditions. The lime and carbon (required when processing scrap) feeder system was last calibrated on 6/12/16 and 6/8/16, respectively.

Furnace NESHAP label was located adjacent to the flux/alloy weigh hopper and appeared to be current and in good condition. The feed/charge scale calibration sticker couldn't be read during the inspection as it was blocked by poured aluminum sows. Facility certified in their most recent semi-annual NESHAP excess emissions/summary report received by the district office on 2/9/16 that the molten metal level was maintained above the archway between the furnace charge well and hearth during reactive fluxing. The molten level was 22.76" at the time of the inspection. Staff reviewed the most recent ACGIH annual inspection report (4/12/15) that was available during the post inspection meeting and requested that the current year report be sent in via email.

The chlorine room is used to store the 2,000 pound liquid chlorine cylinders and evaporator system that is used to supply chlorine gas to EUIMREVERBFURN-S2 for fluxing and demagging. Chlorine cylinders are weighed continuously to keep track of chlorine usage in the reverberatory furnace. There is one scale and one evaporator in this room. The scale was last calibrated on 5/12/16. Chlorine gas was not being injected into the furnace at the time of the inspection. Chlorine concentrations are continuously monitored inside the room and an alarm will be triggered if it exceeds 1.0 ppm. The chlorine sensor was last calibrated on 1/14/16. The reading during the inspection was 0.0 ppm.

EUIMCRUCIBLES-S2:

Emission unit consists of eight natural gas fired holding crucibles for molten aluminum. At the time of the inspection, there were three crucibles present and none were being heated with natural gas. Staff reviewed monthly natural gas usage records used to demonstrate compliance with the NOx 12-month rolling average emission limit.

FGIMCOBLDG-S1:

Flexible group includes all equipment at the facility, including equipment covered by other permits, grandfathered and exempt equipment. The most recent OM&M plan on file for the South plant was received on 3/16/16. The group 1 furnace labels were posted and checked during the inspection. Feed/charge scales have been calibrated within the past six months. The last NESHAP semi-annual excess emission/summary report was submitted to the district office on 2/9/16. Annual ACGIH inspection records for the capture and collection systems are current.

FGIMROTFURN1/2-S2:

Flexible group consists of two 21,000 pound/hour rotary furnaces each equipped with air curtains. A minor modification to ROP MI-ROP-N5957-2012d was approved on 4/29/16 to

incorporate permit to install No. 110-15 to allow for installation of like-size replacement burners that utilize supplemental oxygen for combustion; doors were added to both furnaces to improve thermal efficiency; and four additional modules were added to the 80,000 cfm lime injected shaker style baghouse.

Rotary furnace # 1 was down for maintenance and furnace # 2 was being charged with scrap at the time of the inspection. NESHAP labels for FGIMROTFURN1/2-S2 are located behind each furnace and appeared to be in good condition and reflect operating conditions established during the most recent performance test. Feed/charge scale was last calibrated on 5/25/16 and the sow weight scale on 5/15/16.

No visible emissions were noted during the brief observation of the rotary furnace baghouse. The overall baghouse differential pressure was 9.12". The current bag leak detection (BLD) reading was 1.0% with a BLD set point of 14% with an alarm delay of 55 seconds. The 3-hour average baghouse inlet temperature was 162 degrees F and the lime feed setting was 3.0 which comply with operating conditions (i.e. processing scrap) established during the most recent performance test. The lime feeder was last calibrated on 6/11/16, the thermocouple on 7/17/16 and the draft fan RPM on 7/3/16. The trona feeders for the rotary furnaces were last calibrated on 2/4/16.

Compliance with NESHAP and ROP (i.e. PM10, PM2.5) emission limitations has been verified while processing scrap and for Honda 380 dross. Staff reviewed records that indicate compliance with 12-month rolling time period emission and material throughput limitations.

FGIMCOLDCLEANERS-S2:

The South plant has one cold cleaner located in the truck repair area. The lid was closed and the unit had the required operational label sticker. Staff provided the facility with a replacement MDEQ issued cold cleaner sticker to post on the unit as needed. The emission unit is maintained by Safety Kleen and uses a 100% light petroleum distillate solvent.

FGIMRULE290-S2:

Flexible group is any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290. Staff reviewed fugitive particulate matter emission records for EUIMROAD-S2 for previous six months which indicate compliance with 1000 pound/month emission limitation. The facility is also using Rule 290 for the installation of a Deox casting operation at the South plant. The maximum natural gas burner input rate is 0.646 MMBtu/hour for the Deox casting operation or 0.465 MMCF/month. NOX and PM emission estimates from associated mold release agent usage demonstrates compliance with Rule 290 emission limits.

FGCAM_UNITS-S2:

Flexible group consists of emission units that use a control device to achieve compliance with a federally enforceable emission limitation or standard for particulate matter. The permittee operates and maintains a BLD system as specified in their OM&M plan for the baghouses associated with EUIMREVERBFURN-S2, EUIMROTFURN1-S2 and EUIMROTFURN2-S2. The BLD system runs a daily zero and span calibration. Any calibration errors will trigger the BLD system to alarm and email notification to management who in turn notify maintenance staff to evaluate system. The permittee submits a semi-annual report of monitoring, any deviations and/or monitoring downtime during the reporting period.

During the post-inspection RAR discussion with Messrs. Myers and Roslak and Ms.

Grossheim, staff was asked about potential emission testing required for SVALFURN7 and SVALFURN8 at the North plant. The facility has submitted an air use permit application No. 109-16 and proposed installation and operation of duct burners in the bypass duct for each furnace flue air cooler during furnace idle or low fire conditions when the stack gas temperature drop below 150 degrees F to prevent condensation in the furnace flue Torit baghouses. Under permit application No. 109-16, the facility has proposed no change to current NOX emission limits. Since the permit application is currently pending, staff suggested to Mr. Roslak that he should submit documentation to our office as to why emission testing during duct burner operation should not be required under the air use permit. Staff left the facility at 4:30 pm.

ROP semi-annual compliance certification reports for RAS and RAR were received following the inspection on 8/11/16 and were reviewed by staff as part of the Full Compliance Evaluation report. RAR reported no deviations from ROP terms and conditions during the time period 1/1/16 through 6/30/16. RAS reported eight deviations from ROP terms and conditions during the time period 1/1/16 through 6/30/16. Two reported deviations were for exceeding the permitted flux limit of 56.0 pounds chlorine/ton feed charge on 1/22/16 and 3/24/16 for EUALFURN8-S1. Staff issued a violation notice on 5/11/16 in response to the second reported deviation. The facility response received on 6/1/16 noted that several corrective measures were taken to prevent a reoccurrence. If deviations continue to be reported for permitted flux rate from EUALFURN8-S1, the AQD may need to seek stipulated penalties under AQD consent order No. 35-2014 under Paragraph 13 to address limit under Paragraph 9.A.2. The remaining deviations reported by RAS during the reporting period were associated with the inlet temperature limit to Torit # 2 and # 3 for EUALDRYER3-S1 which is not addressed under the consent order. The total deviation time for all six deviations was less than 0.45% of dryer operating time during the reporting period and was generally less than three degrees above the limit. The facility installed a draft damper on the dryer in July 2016 to prevent excessive draft which should resolve these deviations. Future ROP semi-annual compliance certification reports will be reviewed and evaluated to determine if damper installation reduces dryer over temperature limits.

At the time of the inspection and based on records provided during and following the inspection, the facility appears to be in compliance with MI-ROP-N5957-2012e and 40 CFR Part 63, Subpart RRR requirements referenced in the ROP. -RIL

NAME RIL DATE 8/15/16 SUPERVISOR MB 8/16/2016