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

N595743831

FACILITY: Real Alloy Recycling, Inc.		**SRN / ID:** N5957
LOCATION: 267 N. Fillmore Rd, COLDWATER		**DISTRICT:** Kalamazoo
CITY: COLDWATER		**COUNTY:** BRANCH
CONTACT: Janine Caldwell , Environmental Manager		**ACTIVITY DATE:** 03/28/2018
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 West Garfield Avenue and Real Alloy Recycling, Inc. located at 267 North 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 (HCL) 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 MDEQ-AQD administrative consent order No. 35-2014 that was effective on 6/4/14.

The ROP renewal permit No. MI-ROP-5957-20XX will start 30-day public comment on 4/9/18. The ROP renewal will incorporate Permit to Install (PTI) Nos. 109-16A and 216-16A upon ROP reissuance.

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 (RAS) – ROP Section 1 (aka North Plant):

EUALDRYER3: – 15,000 lb./hour aluminum chip dryer
EUALSHREDDER: – 25,000 lb./hour aluminum crusher/shredder
EUALFURN1: – 18,000 lb./hour reverberatory melting furnace (aka Furnace 1N)
EUALFURN2: – 120,000 lb. reverberatory holding furnace (Group 2 operation)
EUALFURN7: – 9,000 lb./hour reverberatory melting furnace (aka Furnace 7N)
EUALFURN8: – 8,000 lb./hour reverberatory melting furnace (aka Furnace 8N)

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

EUIMDRYER: – 20,000 lb./hour aluminum scrap dryer (last operated Dec. 2008)
EUIMREVERBFURN: – 15,000 lb./hour reverberatory melting furnace (aka Furnace 7S)
EUIMROTFURN1: – 21,000 pound/hour rotary melting furnace with oxyfuel burner
EUIMROTFURN2: – 21,000 pound/hour rotary melting furnace with a low temperature oxy-fuel burner

Compliance Evaluation:

On March 28, 2018, MDEQ-AQD staff (Rex Lane and Cody Yazzie) arrived at 9 am to conduct an unannounced air quality inspection at the Real Alloy facilities to determine

compliance with 40 CFR Part 63, Subpart RRR, MI-ROP-N5957-2012e, PTI Nos. 109-16A and 216-16A, and applicable Air Pollution Control Rules. Staff spoke to the North Plant receptionist and stated the purpose of the visit and requested to meet with Ms. Janine Caldwell, Real Alloy, Environmental Manager for both facilities. Ms. Caldwell arrived shortly thereafter, and we went to a conference room, so staff could go over a list of calibration, process, monitoring and emission records, etc. that staff would like to review during the inspection. Staff requested records of material usage and emission reporting data for all emission units for the past fifteen months (including February 2018; provided 4/11/18); most recent process weigh and chlorine scale, control device thermocouple, baghouse draft fan RPM and bag leak detection calibration dates; and the most recent annual capture and collection system inspection dates for all NESHAP subject emission units.

Currently, RAS operates two 12-hour shifts/day seven days per week and RAR operates three shifts/day five days per week. Facility operational schedule can fluctuate based on customer demand. Staff's visitor/contractor training pass was issued by Real Alloy in September 2017 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.

Real Alloy Specification (RAS):

EUALDRYER3:

Process emissions from the chip dryer are routed to an afterburner, cyclone and a 43,000 ft3/min. baghouse (Torit # 2). Dryer drum seals are controlled by a 34,000 ft3/min. baghouse (Torit # 3) that also control EUALSHREDDER. Emission test to determine compliance with ROP and NESHAP emission limitations was last completed on 7/9/13. The five-year NESHAP retest of the process is scheduled for May 2018. The 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 were 750 and 1515 degrees F, respectively. The three-hour baghouse inlet temperature was 382 degrees F and the differential pressure was 4.6". The current bag leak detection (BLD) reading was 0.2% with a BLD set point of 2% with an alarm delay of 24 seconds. The BLD system was last calibrated on 3/6/18. The facility performs a monthly BLD response test, electronic drift test and probe cleaning on all control equipment equipped with BLD equipment. The BLD equipment automatically runs a daily zero and span calibration. The most recent calibration date for the afterburner thermocouple was 11/3/17. Baghouse draft fan RPM was last calibrated on 1/22/18. The feed scale for the dryer was last calibrated on 12/21/17 and is done on a quarterly basis. No visible emissions were observed from the dryer baghouse stack. Maintenance staff records the presence of visible emissions and baghouse pressure drop every four hours and staff reviewed recent records. An emission test for PM, PM10, THC, D/F, NOX and SOX is scheduled to be performed on the process in May 2018.

Facility certified in their most recent semi-annual NESHAP excess emissions/summary report dated February 27, 2018 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 – 0.00 hours). The most recent annual NESHAP inspection of the afterburner controls occurred on 3/13/18 (copy attached).

During the inspection and post-inspection discussion with Ms. Caldwell, staff pointed out that there was a significant amount of fugitive emissions observed coming out of the front and

back ends of the dryer drum. These emissions are either caused by worn out seals between the dryer drum sections or insufficient draw from Torit # 2 baghouse on the pickup hoods over the dryer drum ends. Ms. Caldwell stated that she would discuss this issue with Mr. Douglas Bryant, RAS Plant Manager, whom staff was introduced to during the inspection. A maintenance worker later indicated to staff that the dryer drum speed and feed rate would be reduced to address fugitive emission concerns.

The NESHAP operational label for EUALDRYER3 could not be located during the inspection and was determined to be missing. Ms. Caldwell emailed staff a photo of the replaced dryer NESHAP label on 3/29/18.

EUALSHREDDER:

Process emissions from the crusher/shredder are routed to a 34,000 ft3/min. baghouse (Torit # 3) that is equipped with a BLD system. Emission test to determine compliance with ROP and NESHAP emission limitations was completed on 7/9/13. The five-year NESHAP retest of the process is scheduled for May 2018. Feed/charge scale for the aluminum shredder was last calibrated on 12/21/17. The process started up during the inspection and no visible emissions were observed from the baghouse stack. The baghouse differential pressure was 4.5". The current bag leak detection (BLD) reading was 0.08% with a BLD set point of 2% with an alarm delay of 36 seconds. The BLD was last calibrated on 3/6/18 and the draft fan RPM on 1/22/18. An emission test for PM, PM10 and THC is scheduled to be performed on the process in May 2018. 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 3/30/18 (copy attached).

EUALDROSS:

Process emissions from dross material handling and load out are controlled by a 50,000 FT3/min. baghouse (Torit # 1). Torit # 1 is not equipped with a BLD system. During the inspection, a truck was backing into the load bay to receive dross. The fabric curtains that hang down from the collection hood over the loading area appeared to be in good condition. No visible emissions were observed from the baghouse stack and the differential pressure reading was 3.0". Maintenance staff records the presence of visible emissions and baghouse pressure drop every four hours and staff reviewed recent records. A particulate matter emission test is scheduled to be completed on the process in May 2018.

EUALCRUCIBLES:

Ten natural gas-fired holding crucibles used to transport molten aluminum off-site. Four 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:

Flexible group consists of three Group 1 reverberatory secondary aluminum melt furnaces (EUALFURN1, EUALFURN7 and EUALFURN8) and a Group 2 holding furnace EUALFURN2. Process emissions from furnaces EUALFURN1 and EUALFURN2 vent to a lime injected 65,000 ft3/min. baghouse # 2 (North; stack height 95') equipped with a BLD

system. Process emissions from EUALFURN7 and EUALFURN8 vent to a lime injected 60,000 ft3/min. baghouse #1 (South; stack height 61.3') equipped with a BLD system.

Emission testing was last conducted on all four furnaces and their respective hearth flues (i.e. SV ID) in July through September 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 limit. Several other parameters tested between 92 – 97% of their respective emission limits including HCL and PM10 for EUALFURN1; PM10 for SVALFURN1; and HCL for SVALFURN8. The facility has entered MDEQ-AQD administrative Consent Order No. 35-2014 to address these emission exceedances. An emission test has been scheduled for EUALFURN1 and EUALFURN2 and their associated flues in May 2018.

In July 2015, RAS was issued PTI No. 110-15 to route uncontrolled flue gas emissions from EUALFURN7 and EUALFURN8 to individual air coolers and lime injected baghouses equipped with BLD with final discharge through a common stack to reduce PM10 emissions below permit limitations. In August 2016, RAS was issued PTI No. 109-16 to install two 5 MMBtu/hour natural gas fired duct heaters to maintain the flue gas temperature above the dew point to ensure proper baghouse operation during low ambient temperature conditions. In October 2017, PTI No. 109-16A was issued to revise flue gas NOX emission limits and remove flue gas HF and HCL emission limits based on 2016 and 2017 emission testing results.

During the inspection, all furnaces appeared to be in operation. Furnace # 1 started a new batch cycle on 3/27/18 and had a molten (heel) level of 21". Furnace # 7 started a new batch cycle on 3/27/18 at 6 pm at a heel level of 19" and is currently full at a heel level of 36". Furnace # 8 started a new batch cycle on 3/28/18 at 1:30 am at a heel level of 18" and the current heel level was 29". The furnace archway height is 15" in all three Group 1 furnaces.

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. The chlorine injection pump had recently been pulled out of EUALFURN7 for maintenance and staff noted a few brief sharp whiffs of chlorine gas while looking at the labels for EUALFURN7 and EUALFURN2. The furnace feed scale was last calibrated on 12/21/17.

For baghouse #1, the current bag leak detection (BLD) reading was 0.9% with a BLD set point of 7% with an alarm delay of 37 seconds. Baghouse # 1 had a pressure drop reading of 1.6". The 3-hour average baghouse inlet temperature was 104 degrees F and the lime feed setting dial appeared to be set at 3.5 versus the 3.75 setting established during the most recent performance test. Staff asked Ms. Caldwell to look further into the lower lime dial setting issue. No visible emissions were noted from the stack during a brief observation. The BLD and thermocouple were last calibrated on 3/5/18 and 1/27/18, respectively. The lime flow feeder and draft fan RPM were last calibrated on 1/31/18 and 1/24/18, respectively.

For baghouse #2, the current bag leak detection (BLD) reading was 0.15% with a BLD set point of 3% with an alarm delay of 35 seconds. Baghouse # 2 had a pressure drop reading of 10". No visible emissions were noted from the stack during a brief observation. The 3-hour average baghouse inlet temperature was 92 degrees F and the lime feed setting was 3.0 which comply with operating conditions established during the most recent performance test. The BLD and thermocouple were last calibrated on 3/5/18 and 11/3/17, respectively. The lime flow feeder and draft fan RPM were last calibrated on 1/31/18 and 1/24/18, respectively.

Staff observed the sight glass tube in the lime silo for each baghouse and observed free flowing conditions in the sight glass to Baghouse # 2. The sight glass tube for Baghouse # 1 was either obscured or had been replaced with an opaque section and free flowing conditions could not be verified. Staff informed Ms. Caldwell that this should be fixed asap. Per 4/11/18 correspondence from Ms. Caldwell, the sight glass for the North Plant were replaced on 3/29/18.

The chlorine room is in between baghouse # 1 and # 2 and is used to store the liquid chlorine cylinders and evaporator system that is used to supply chlorine gas to EUALFURN1, EUALFURN7 and EUALFURN8 for fluxing and demagging aluminum scrap. Chlorine cylinders are weighed continuously to keep track of chlorine usage in each furnace. The four scales were last calibrated on 3/12/18. Scale # 1 and # 2 is used for EUALFURN1 and current readings were 1,299 and 2,359 pounds, respectively. Scale # 3 is used for EUALFURN7 and current reading was 1,780 pounds. Scale # 4 is used for EUALFURN8 and current reading was 2,494 pounds. There are three evaporators that are designated to a specific furnace. Evaporator # 1 serves EUALFURN1, evaporator # 2 serves EUALFURN7 and evaporator # 3 serves EUALFURN8. 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 dated 2/27/18 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 EUALFURN2. ACGIH annual capture and collection system inspection records dated 1/6/18 for EUALFURN1, EUALFURN7, and EUALFURN8 were provided following the inspection on 4/12/18. Staff reviewed records that indicate compliance with 12-month rolling time-period emission and material throughput limitations.

FGALBLDG:

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 is dated March 2016. The group 1 and 2 furnace labels were posted and checked during the inspection. The dryer furnace label was missing during the inspection and was re-posted on 3/29/18. 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 2/28/18. Annual ACGIH inspection records for the capture and collection systems appear to be current.

FGALFURN7/8:

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 were only charged once with scrap that contained beryllium and that they do not intend to process scrap containing beryllium again.

FGALCOLDCLEANER:

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 while not in use and the operations sticker was on the inside of the lid. The cold cleaner is maintained by Safety Kleen and uses Safety Kleen's Premium 150 solvent. The product SDS indicates that it is a 100% light petroleum distillate solvent. Staff provided the facility with a replacement MDEQ sticker.

FGALRULE290:

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 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 and EUALFURN1/2/7/8. The BLD system automatically 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. Caldwell, 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 computer software (i.e. Ignition) 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 (RAR):

EUIMDRYER:

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:

Emission unit consists of salt cake and hot dross handling, storage and load out process that is controlled by a 40,000 ft3/min. baghouse. A mud pan was cooling under the collection hood at the time of the inspection. The fabric curtains hanging down from the dust collection hood were in very poor condition and staff pointed this out to Ms. Caldwell and that these curtains should be replaced as soon as possible. The curtains are designed to reduce the amount of fugitive emissions especially during dross loading into trucks. No visible emissions were noted from the baghouse stack. The baghouse pressure drop reading was 0.1" which seems unusually low and staff pointed this out to Ms. Caldwell and recommended that maintenance evaluate this further. Staff reviewed the visible emission and pressure drop reading records done by maintenance for week of March 25th. Per a 4/11/18 email from Ms. Caldwell, fabric curtains have been ordered for the South Plant Hot Dross collection hood and will be replaced by 4/30/18.

EUIMREVERBFURN (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 ft3/min. 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 in April 2013 and demonstrated compliance with NESHAP and ROP emission limitations. The five-year retest for compliance with NESHAP and ROP emission limitations was completed on April 5th and 6th, 2018.

The furnace was recently tapped according to the batch operation report and had a current molten heel level of 15.3 inches. No visible emissions were observed from the baghouse stack during the inspection. The overall differential pressure drop across the 4-cell pulse jet baghouse during the inspection was 7.82" water column. The current bag leak detection (BLD) reading was 3.98% with a BLD set point of 10% with an alarm delay of 30 seconds. The BLD detector was last calibrated on 12/25/17. The 3-hour average baghouse inlet temperature was 72 degrees F and the lime feed setting was 1.5 which complies with operating conditions established during the most recent performance test. The baghouse inlet thermocouple was last calibrated on 9/27/17. Staff observed the lime sight glass in the lime silo for the baghouse and observed free flowing conditions.

Furnace NESHAP label was located adjacent to the feed conveyor which is being taken out of service. The label appeared to be current and in good condition. Facility has a smaller front-end loader that will be used in the future to charge this furnace. The feed/charge scale is shared with the rotary furnaces and is located next to the rotary furnace control tower. The feed/charge scale was last calibrated on 12/12/17 and is done quarterly. Facility certified in their most recent semi-annual NESHAP excess emissions/summary report received by the district office on 2/28/18 that the molten metal level was maintained above the archway between the furnace charge well and hearth during reactive fluxing. Staff reviewed feed/charge and natural gas usage records which indicated compliance with material limits. ACGIH annual capture and collection system inspection records dated 6/18/17 for EUIMREVERFURN was provided following the inspection on 4/12/18.

The chlorine room is used to store the liquid chlorine cylinders and evaporator system that is used to supply chlorine gas to EUIMREVERBFURN 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 12/12/17. 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 0.3 ppm. The chlorine sensor was last calibrated on 10/5/17. The reading during the inspection was 0.0 ppm.

EUIMCRUCIBLES:

Emission unit consists of eight natural gas fired holding crucibles for molten aluminum. Staff reviewed monthly natural gas usage records used to demonstrate compliance with the NOx 12-month rolling average emission limit.

FGIMCOBLDG:

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 December 2017. 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 2/28/18. Annual ACGIH inspection records for the capture and collection systems are current.

FGIMROTFURN1/2:

Rotary furnace # 1 was down for refractory liner replacement and furnace # 2 was being charged with scrap at the time of the inspection. NESHAP labels for FGIMROTFURN1/2 are located behind each furnace and appeared to be in good condition and reflect operating conditions established during the most recent NESHAP performance test in September/October 2017. Feed/charge scale was last calibrated on 12/12/17.

No visible emissions were noted during the brief observation of the rotary furnace baghouse. The overall baghouse differential pressure was 12.4". The current bag leak detection (BLD) reading was 1.0% with a BLD set point of 16% with an alarm delay of 118 seconds. The BLD detector was last calibrated on 12/5/17. The 3-hour average baghouse inlet temperature was 105 degrees F and the lime (west) feed setting was 2.0 F and the lime (east) feed setting was 3.5 which comply with operating conditions established during the most recent performance test. The baghouse inlet thermocouple was last calibrated on 11/30/17.

ACGIH annual capture and collection system inspection records dated 3/10/18 for EUIMROTFURN1 and EUIMROTFURN2 were provided following the inspection on 4/12/18. Compliance with NESHAP and ROP (i.e. PM10, PM2.5) emission limitations has been verified while processing scrap and dross. Staff reviewed records that indicate compliance with 12-month rolling time-period emission and material throughput limitations.

FGIMCOLDCLEANERS:

The South plant has one cold cleaner located in the truck repair area. The lid was open while not in use and the unit had the required operational label sticker. Staff informed Ms. Caldwell that the cold cleaner lid needed to be down when not in use. She informed maintenance and they indicated that they would close it. Staff provided the facility with a replacement MDEQ issued cold cleaner sticker to post on the unit as needed. The cold cleaner is maintained by Safety Kleen and uses Safety Kleen's Premium 150 solvent. The product SDS indicates that it is a 100% light petroleum distillate solvent.

FGIMRULE290:

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 for previous fifteen 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, EUIMROTFURN1 and EUIMROTFURN2. 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.

ROP semi-annual compliance certification reports for RAS and RAR were received on 2/28/18 and were reviewed by staff as part of the Full Compliance Evaluation report. RAS reported one deviation from ROP terms and conditions during the time-period 7/1/17 through 12/31/17. The RAS deviation reported was for exceeding the permitted flux limit of 56.0 pounds chlorine/ton feed charge on 12/16/17 for EUALFURN8. The actual flux rate was 57.9 pounds chlorine/ton feed charge which is 103.4% of the limit. Staff has previously cited RAS for similar flux rate exceedances. Facility response to the citation has been that the calculated HCL emissions with the higher flux rate does not exceed HCL emission limit based on stack test data. RAR reported one deviation from ROP terms and conditions during the time-period 7/1/17 through 12/31/17. The RAR deviation reported was for exceeding the rotary baghouse inlet temperature limit of 231 degrees F on 9/24/17. The actual inlet temperature was 234 degrees F which is 101.3% of the limit or 0.04% of the operating time during the reporting period. Staff has previously cited RAR for similar baghouse inlet temperature exceedances. Corrective measures taken by the facility to reduce baghouse inlet temperature were to slow furnace feed rate, check air damper function and staggering charging of material between the two rotary furnaces.

Summary:

At the time of the inspection and based on records provided during and following the inspection along with corrective actions (i.e. reposting of chip dryer NESHAP label at North plant; lime sight glass replacement at both North and South plants; replacement of fabric curtains on dross handling process at South plant) taken by the facility 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 4/12/18 SUPERVISOR MA 4/19/2018