

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N601362741

FACILITY: CONTINENTAL ALUMINUM		SRN / ID: N6013
LOCATION: 29201 MILFORD RD, NEW HUDSON		DISTRICT: Warren
CITY: NEW HUDSON		COUNTY: OAKLAND
CONTACT: Mark Buchner , President		ACTIVITY DATE: 03/25/2022
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY 2022 SM CMS scheduled inspection of Continental Aluminum ("Continental"), an aluminum scrap recycling and remelting facility. All furnaces (RO, RV1 & RV2) are currently not operating		
RESOLVED COMPLAINTS:		

Continental Aluminum (N6013)
29201 Milford Road
New Hudson, Michigan 48165-9741

NACIC Code: 331314 & SIC Code: 3341

Operating status: Continental Aluminum has idled two continuous process Reverberatory Furnaces (RV1- De-ox & RV2-Alloy) since August 2021 and one batch (about 3 hours) process Rotary Furnace (RO) since December 2021. The furnaces are highly likely to permanently shut down as indicated by transferring plant materials management vehicles, machine lubricating oils, etc.

Active Permit: PTI No. 504-96F dated September 27, 2013. On April 18, 2022, Courtney Boc stated that Mark Buchner wanted to keep the permit active at this time.

On March 25, 2022, I conducted an annual level-2 **FY 2022 SM CMS scheduled** inspection of Continental Aluminum ("Continental"), an aluminum scrap recycling and remelting facility, located at 29201 Milford Road, New Hudson, Michigan 48165-9741. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994, PA 451; Michigan Department of Environment, Great Lakes and Energy, Air Quality Division (EGLE-AQD) administrative rules; Area Source NESHAP / MACT RRR; and the permit (PTI No. 504-96F).

During the inspection, Ms. Courtney Boc (Phone: 248-437-1001-ext. 5120; Cell: 248-977-7630; Fax: 248-437-8885; E-mail: cBoc@ContAlum.com or cBoc@MetalExchangeCorp.com), Quality & EHS Manager (on the previous visit), and Mr. Konrad Makaro (Phone: 248-437-1001-ext. 5110; Cell: 248-379-7306; Fax: 248-437-8885; E-mail: cMakaro@ContAlum.com or cMakaro@MetalExchangeCorp.com), Production Manager, assisted me.

On July 10, 2019, when RV2 stack tests per the permit (PTI No. 504-96F dated September 27, 2013) and NESHAP / MACT 3R were being performed as a trial operation of RV2 started about March 2019, US EPA inspectors, Ms. Marie St. Peter (Phone: 312-886+4746; Fax: 312-353-8289; E-mail: StPeter.Marie@EPA.gov; Mail Code: AE-17J), Environmental

Engineer, and Ms. Sarah Clark (Phone: 312-886+9733; Fax: 312-353-8289; E-mail: Clark.Sarah@EPA.gov, Environmental Engineer Mail Code: AE-18J), both at US EPA Region 5, 77 W. Jackson Blvd, accompanied me for the FY 2019 inspection.

Based upon my September 15 & 21, 2021, the entire plant including RV1 & RV2 and RO had been idled. Based upon my March 25, 2022, inspection, the plant is highly unlikely to restart.

September 15, 2021: Only RO was operating at reduced capacity of 70 percent. RV1 & RV2 had not been operating since August 04. At this time, RO processed only either white dross (40 percent Al, skimming) or ingots to make saw product. Only saws were made from either white dross or ingots; no ingots produced. Number of employees reduced from 60 to 14. Employees were kept busy doing miscellaneous projects like cleaning. All reverberatory furnaces (RV1 & RV2) were idled and were cool-to-touch.

September 21, 2021: All furnaces (RO, RV1 & RV2) were idled and were cool-to-touch.

March 25, 2022: Konrad Makaro stated that the plant highly likely will not restart. All materials management equipment (Hi-Los, front end loaders, etc.), machine lubricants, laboratory equipment / instruments, etc. will either be sold or moved to other Metal Exchange's plants. All product aluminum materials were shipped by February 2022.

Essential equipment, such as three compressors for the furnaces (combustion air supply is necessary for a furnace to operate) and blowers (air cooling), have been removed and shipped to other plants by April 2022

No scrap or any material in the bins. No Al scrap anywhere. The products (ingots and saws) have all been shipped. Only four (4) employees necessary to restart the furnaces are on payroll. Additionally, two (2) employees are working in shipping. The furnaces are incapable of operating as combustion air compressors have been removed.

Conclusion

Currently Continental is in compliance with the permit and MACT 3R. Continental will highly likely not restart the furnaces.

NAME *J. S. McNamehall*

DATE May 2, 2022

SUPERVISOR *Joyce*