

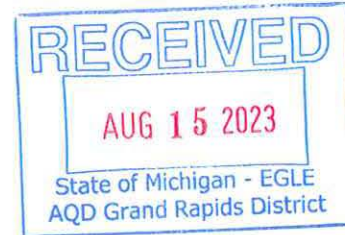


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August 8, 2023



Mr. Eric Grinstern  
EGLE, AQD, Grand Rapids District  
350 Ottawa Avenue NW, Unit 10  
Grand Rapids, Michigan 49503

Re: Century Foundry, Inc. Plant 2 SRN N7714, July 21, 2023 Violation Notice

Dear Mr. Grinstern:

The following letter is in response to the July 21, 2023 Violation Notice detailing the results of the compliance inspection conducted on May 11, 2023 at Century Foundry, Inc. – Plant 2 located at 2524 Park Street, Muskegon Heights, Michigan. The air emissions at Plant 2 are regulated by Permit To Install 162-14B, issued December 12, 20217.

The Violation Notice outlines the following violations noted during the inspection:

Process Description

FGFPT2FURN1-5

Aluminum Melting Furnaces

Rule/Permit Condition Violated

PTI No. 162-14B, FGFPT2FURN1-5, Special Conditions 1.2. & 3.

Comments

Exceedances of the permitted PM10 and PM2.5 emission rates from January 2022 through May 2023.

Dates of Violations:

5-3-22 PM10 = .8530 pph, PM2.5 = .8530 pph

7-5-22 PM10 = .5657, PM2.5 = .5657

1-27-23 PM10 = .6020, PM2.5 = .6020

1-31-23 PM10 = .5602 = PM2.5 = .5602

Causes and Duration of Violations:

The allowable permit particulate emission rates in accordance with Permit To Install 162-14B are 1. PM 0.60 pph, 2. PM10 0.55 pph and PM2.5 0.55 pph. Prior to the May 11, 2023 inspection the emission rates were calculated using an average of 24 hours per day on a monthly basis. 24 hours per day was used because the furnaces were on 24 hours per day. After the inspection, the facility was notified by the EGLE that the hourly emissions should have been calculated over an

8-hour shift using a daily average. A 10-hour shift was used in instances where additional metal was melted.

The calculations were modified using the new parameters. Also, existing controls that were not used for the original calculations were applied to provide a more realistic representation of the emissions in accordance with permit 162-14B. A copy of the PM, PM10 and PM2.5 Hourly Emission Tables for FGPT2FURN1-5 have been e-mailed for reference.

**Ongoing Violations:**

The last exceedance calculated occurred on January 31, 2023 where PM10 was .5602 pph and PM2.5 was .5602 pph.

**Summary of Actions Taken:**

PM, PM10 and PM2.5 particulate emissions from FGPT2FURN1-5 will be maintained below the allowable limit by reducing the tons of metal melted per day until long term emission controls can be implemented.

**Proposed Corrective Actions:**

The Plant 2 crucible furnaces are equipped with covers that are open approximately 75% of the shift. When the covers are closed during 25% of the shift, it is estimated that the particulate emissions are contained. The total quantity of PM, PM10 and PM2.5 particulates emitted during the shift is reduced by 25%. The particulate emissions were revised using the following formula:

PM emissions = Total Tons Per Hour Emissions \* 75% \* .3 (60% PM drop out in the plant + 10% PM captured by the plant makeup air system). No exceedance was noted for PM from January 2022 through May 2023. PM10 emissions = Total Emissions \* 75% \* .9 (10% PM10 captured by the plant makeup air system). PM2.5 emissions = Total Emissions \* 75% \* .9 (10% PM2.5 captured by the plant makeup air system). The facility proposes to reduce the particulate emissions from the Plant 2 crucible furnaces by reducing the quantity of metal processed until particulate emission controls can be installed on each furnace. The particulate emissions will be captured and filtered through an existing dust collector. It is anticipated this can be completed without modifying the existing air use permit in accordance with Michigan EGLE, Air Permit To Install Exemption Rule 285(2)(f).

A copy of the PM, PM10 and PM2.5 calculations for January 2022 through May 2023 have been e-mailed to EGLE, AQD, Grand Rapids District Office.

**Dates Corrective Actions Will Take Place:**

Total metal melted will be maintained at levels that will ensure PM, PM10 and PM2.5 particulate emissions will not exceed permit limits until controls can be provided on the crucible furnaces.

**Reoccurrence Prevention:**


To ensure that emission controls are maintained and operated correctly the following procedures have been written and will be implemented as soon as possible.

A Malfunction Abatement Plan (MAP) has been written in accordance with Rule 911 for the two baghouse dust collectors controlling air emissions for the Plant 2 finishing operations. A copy of the MAP has been e-mailed to the EGLE, AQD, Grand District office for review.

In addition, a Management Practice Plan has been written and will be implemented for Plant 2 in an effort to reduce the emission of hazardous air pollutants (HAPs) in accordance with NESHAP ZZZZZZ – National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Aluminum, Copper, and Other nonferrous Foundries, Section 63.11550.

If you have any questions, please contact Mr. Bill Hilton (616) 754-8556 or email [bhilton@rcsi.cc](mailto:bhilton@rcsi.cc).

Sincerely,



Jim Jacobs  
Manufacturing Manager