

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

B157772319

<b>FACILITY:</b> GREDE LLC - IRON MOUNTAIN		<b>SRN / ID:</b> B1577
<b>LOCATION:</b> 801 S CARPENTER AVE, KINGSFORD		<b>DISTRICT:</b> Marquette
<b>CITY:</b> KINGSFORD		<b>COUNTY:</b> DICKINSON
<b>CONTACT:</b> Tom White , Environmental Maintenance Lead		<b>ACTIVITY DATE:</b> 06/10/2024
<b>STAFF:</b> Michael Conklin	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> Targeted inspection for FY 24.		
<b>RESOLVED COMPLAINTS:</b>		

**Facility: Grede, LLC – Iron Mountain (B1577)**

**Location: 801 South Carpenter Avenue, Kingsford, MI 49802**

**Contact(s): Tom White, Lead Environmental Maintenance, 715-548-1095**

**Leah Thwing, EHS Supervisor, 219-743-2425**

### Regulatory Authority

*Under the Authority of Section 5526 of Part 55 of NREPA, the Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.*

### Facility Description

Grede, LLC – Iron Mountain (Grede) is a gray iron foundry located in Kingsford, MI. The company produces specialty iron castings used for industrial machinery and agricultural equipment. Grede operates a main foundry and a module foundry in the same building. A single WRIB Company cupola provides all the molten iron used by the main and module foundry.

### Process Description

Production operations include raw material handling and preparation, mold and core production, metal melting, pouring, cooling, and casting finishing. The metal melting process begins with bulk raw materials received in the charge yard, which are used to make up the charge. Raw materials include scrap steel, pig iron, coke, and limestone. A predetermined amount of metal, coke, and limestone are added into a bucket that is elevated up to the cupola. Iron is melted by the burning of a coke bed and flows down the cupola. The flux combines with nonmetallic impurities in the iron to form slag. Molten iron and slag are removed at the bottom of the cupola. The molten iron is tapped into an electric induction holding furnace. From the holding furnace, the molten iron is poured into ladles that are transported back to pouring stations. The molten iron is poured from

ladles into the molds to create castings. The castings are then cooled and transported to the shakeout line, where the mold and core sand are shaken loose from the casting. The castings then proceed to finishing where they undergo chipping, grinding, shot blasting (Wheelabrators), and final quality inspections before being packaged and shipped to customers.

The production and assembly of molds and cores are the other main processes at the facility. For the production of phenolic urethane coldbox (Isocure) cores, sand and resin are mixed in mullers prior to being dispensed to the ten Isocure core machines. For the production of phenolic resin (shell) cores, the sand and resin are pre-mixed and dispensed to 21 natural gas heated core machines. The cores are then transported to one of seven mold lines where they are used to make the molds for casting. Used sand from casting shakeout is recycled and reused to make new molds.

### Emissions Reporting

Grede is required to report its annual emissions to the Michigan Air Emissions Reporting System (MAERS). For 2022, the source reported the following total emissions in the table below.

Pollutant	Tons
CO	0.9
Lead	0
NOx	2.7
PM10, Filterable	19.4
PM2.5, Filterable	2.6
SO2	2.1
VOC	24.8

### Compliance History

There have been no violation notices issued since the last full compliance evaluation was conducted in August 2022.

### Regulatory Analysis

The facility is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of volatile organic compounds exceeds 100 tons per year and the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is equal to or more than 25 tons per year. EU-P009 CUPOLA, EU-P016 MAIN PLANT POURING AND COOLING and EU-P036 MODULE POURING AND COOLING at the stationary source are subject to the Maximum Achievable Control Technology Standards for Iron and Steel Foundries promulgated in 40 CFR Part 63, Subparts A and EEEEE. Grede is currently subject to MI-ROP-B577-2020 and PTI No. 28-22.

### Inspection

An on-site inspection was performed at Grede on 6/10/2024 to determine compliance with ROP No. MI-ROP-B577-2020, Consent Order No. AQD 2021-01, and PTI No. 28-22. AQD staff, Michael Conklin and Drew Yesmunt, arrived at 9:30 AM CST and met with facility representatives Tom White, Cody Wolsker, and Leah Thwing. The inspection began with having a meeting to discuss the inspection plan and any changes/updates to the facility. After the discussion, a tour of the plant was conducted to inspect the emission units outlined in the ROP. The facility is currently operating Monday through Thursday, one 10-hour shift per day.

Changes to the facility since the last inspection include a temporary change in catalyst being used for the Isocure process. Due to dimethylethylamine (DMEA) not being commercially available in 2023, Grede replaced this catalyst with dimethylpropylamine (DMPA). The facility elected to use the “meaningful change” exemption and provided an air permit exemption analysis on 7/20/2023. The analysis showed a 53% decrease in hazard potential by switching from DMEA to DMPA. As a result, the change in catalyst material is not considered a meaningful change.

On 4/25/24, an air permit exemption analysis was submitted for the replacement of the Steelcraft baghouse (EU-P014) with a Camfil cartridge baghouse. The facility is electing to use Rule 285(2)(d) for the baghouse replacement since the new baghouse has control efficiency equivalent or better than the prior. The dust collector will also be equipped with secondary filters and high efficiency particulate air (HEPA) grade filters that have 95% and 99.97% efficiency, respectively. In addition, the stack height is proposed to increase from 44 feet to 45 feet above ground surface. At the time of the inspection, the new baghouse was not installed but a concrete pad has been poured. The company stated the new baghouse is planning to be installed in July 2024.

**EU-P009 Cupola**

This emission unit includes a WRIB Company 72-inch refractory lined, water wall, high efficiency cupola. The cupola has a maximum melt rate of 20 tons per hour. Natural gas is used for lighting coke and the coke is used to maintain melting temperature in the cupola. Pollution control equipment includes four natural gas-fired afterburners for VOC, CO, and HAPs, a low efficiency scrubber (quench tank) for SO<sub>2</sub>, and a Hartzell Engineering Corporation positive pressure baghouse for PM. This emission unit is subject to 40 CFR Part 63 Subpart EEEEE.

***Emission/Material Limits***

The cupola contains emission limits for CO, PM, PM<sub>10</sub>, SO<sub>2</sub>, and visible emissions (VE). Compliance with the emission limits is demonstrated through control equipment monitoring and performance testing.

The cupola contains a charge limit of 450 tons per day and 164,250 tons per year. Compliance with these limits is demonstrated through melt logs.

***Process/Operational Restriction(s)***

Grede maintains an Operations & Maintenance Plan (Rev. 3/27/2020) for the cupola and associated control equipment. The facility is required to continuously monitor and maintain the proper operation of the afterburners, quench tank, and baghouse for the cupola. Performance monitoring parameters with ranges of proper operation and observed data from control room, during the inspection, are outlined in the table below.

Parameter	Range	Observed (10:05 AM CST)
Baghouse fan	115 – 281 Amps	135 Amps
Baghouse d.p.	1.0 in WC minimum	5.6 in WC
Afterburner temperature	1300 degrees F minimum	1572 degrees F

Data was collected from the cupola control room while the cupola was in “on-blast” status with a blast rate of 6797 scfm and a charge rate of 12 ton/hr.

Later in the inspection, we proceeded to the roof of the facility to inspect the cupola housing, cupola stack, and baghouse for visible emissions. No visible emissions were observed from the cupola exhaust duct and baghouse, however, visible emissions (smoke) were observed from the south side of the cupola housing. Mr. White observed the fugitive emissions from the cupola housing and alerted the control room to increase the fan power. The fan amperage was increased to 182 amps. This creates more draw of the flue gas when a charge is loaded. In doing so, fewer fugitive emissions are released from the cupola and more of the flue gas is captured to the baghouse. AQD staff proceeded to conduct a Method 9 test and results showed a 6-minute average opacity of less than 5%. Since the issue was immediately corrected and the Method 9 test did not show an opacity exceedance of 20%, a violation notice will not be issued. Going forward, Grede needs to frequently monitor the cupola charge area to ensure there is sufficient capture of all exhaust gasses.

### *Testing/Sampling*

Performance testing on the cupola last occurred in December 2023 for MACT EEEEE compliance. The pollutants measured were VOHAP and PM. Test results showed an average emission rate of 0.25 ppmvd at 10% O<sub>2</sub> for VOHAP and 0.0010 gr/dscf for PM. These results show compliance with the MACT EEEEE emission limits.

Testing for compliance with the CO, PM, PM<sub>10</sub>, and SO<sub>2</sub> emission limits last occurred in December 2020. The cupola passed for all emission limits except PM<sub>10</sub>. A VN was issued on 2/19/2021 for the failed stack test. Grede retested for PM<sub>10</sub> in December 2021 and passed with an average emission rate of 1.01 pph. Testing against these emission limits is next required by December 2025.

### *Monitoring/Recordkeeping*

Grede records the number and weight of charges added to the cupola on a production day basis. The facility maintains a melt log that notes the date, minutes the cupola was operating, number of charges added to the cupola, total tons of charges, average ton/hour of charge, and cupola downtime minutes. Grede uses an average 1.25 ton/charge multiplier to factor the weight of each charge. For July 2023, the average charge rate to the cupola was between 13-15 ton/hr and the total amount of charges melted was 2,206 charges (2,758 tons). Grede also maintains a 12-month rolling sum of the amount of charges melted in the cupola. For 2023, the 12-month rolling sum was 30,508 tons. The facility is staying well below its melt limit of 164,250 tpy based on the records reviewed. Grede has only been operating one shift per day, where historically they would run up to three shifts per day. This has caused a decrease in the amount charged compared to in the past.

Grede is required to continuously monitor and record the baghouse differential pressure, afterburner temperature, and baghouse fan amperage as part of the compliance assurance monitoring (CAM) plan. These operating parameters are continuously monitored from the cupola control system in the melt room of the plant. In addition, the facility is required to monitor and record visible emissions observations from the baghouse on a daily basis. Compliance with these required records were verified by requesting daily records for the dates 4/23/24 and 5/15/24. The records provided and reviewed indicate the baghouse fan amperage was between 115-280 amps, the differential pressure across the baghouse was greater than 1 in WC, stack temperature was greater than 1300 degrees F, and no visible emissions were detected from the cupola.

As part of the O & M Plan, Grede keeps records of preventive maintenance (PM) performed on the cupola and control equipment. Records of weekly PM's conducted on the Cupola baghouse and blower were requested for the weeks 9/10/23 and 3/17/24. Records were provided that note the items inspected, if they were in okay condition, or if a work order was submitted with a description of issues found. A record of the monthly PM's conducted on the Cupola, baghouse, blower and quencher was requested for June 2023 and February 2024. Monthly PM records were provided that note the items inspected and the condition. Malfunction and corrective action records were provided for 2023.

Grede is required to calculate and maintain records of CO, PM10 and SO2 emission rates on a 12-month rolling time period. The facility is required to use emission factors derived from the most recent stack test. Spreadsheets were provided that show the monthly amount of material melted, 12-month rolling total of material melted, and 12-month rolling total of CO, SO2, and PM10 emissions from the cupola. Taking the lb/hr stack test result and ton/hr melt rate during the test, the facility calculates a lb/ton emission factor for these pollutants. A review of these records shows the 12-month rolling emission rates of SO2, CO, and PM10 to be below the emission limits. For the period June 2023 through June May 2024, the CO emissions were 0.781 tons, PM10 was 0.999 tons, and SO2 was 1.589 tons. The facility is using the December 2020 stack test emission factors for CO and SO2, and the December 2021 stack test emission factor for PM10 in calculating the emissions rates.

### *Reporting*

A review of the 2023 annual compliance and deviation reports show 1 deviation reported for EU-P009 Cupola. The deviation was for a small tear in the cupola baghouse blower expansion joint resulting in visible emissions. Corrective actions were taken, and the duration of the event was 15 minutes.

The afterburners and baghouse are CAM subject control devices. The afterburners control CO emissions while the baghouse controls particulates. A review of the 2023 CAM Excursion/Exceedance and Monitor Downtime reports indicate the cupola had no exceedances.

***Stack/Vent Restriction(s)***

The baghouse was inspected for visible emissions, proper operation, and overall condition. No visible emissions were observed from the main exhaust duct to the baghouse, the blower, or the baghouse.

**EU-P011 Shell Core**

This process represents the production of phenolic resin (shell) cores. The cores are produced on 9 natural gas heated core machines. Emissions from the core machines are vented into the plant, and subsequently the core area is vented by fans located on the roof. The sand used is pre-coated with a resin prior to purchase; therefore, no mixing of sand and resin is required.

***Emission/Material Limits***

The shell core process contains an emission limit for PM that is practically enforceable through proper operation and maintenance of equipment and emissions testing if requested.

***Testing/Sampling***

Testing has not been required for this emission unit.

***Stack/Vent Restrictions***

The shell core process is vented through three ceiling vents that act as general ventilation for the process. During the inspection, the vent fans were on and appeared to be ventilating properly.

**EU-P012 Main Plant Sand System**

Process includes activities associated with collection and distribution of mold sand used in the Main Plant. The Main Plant Sand System is controlled by the Large Wet Dust Collector.

***Emission/Material Limits***

The Main Plant Sand System contains PM and PM10 emission limits that are made practically enforceable through proper operation and maintenance of the Large Wet Dust Collector, monitoring of pressure drop, fan amperage, visible emissions, and emissions testing if requested.

***Process/Operational Restrictions***

Grede maintains an O & M Plan (Rev. 12/15/2021) for the Main Plant Sand System and associated control equipment. The facility is required to continuously monitor and maintain the proper operation of the Large Wet Dust Collector. Performance monitoring parameters with ranges of proper operation and observed data from control panel, during the inspection, are outlined in the table below.

Parameter	Range	Observed (10:25 AM CST)
Fan motor	122 – 137 Amps	127 Amps
Differential Pressure	2.0 – 4.0 in. WC	3.1 in WC

#### *Design/Equipment Parameters*

The Large Wet Dust Collector is equipped with a differential pressure gauge. This was observed on-site.

#### *Testing/Sampling*

Verification of PM and PM10 emission rates from the Main Plant Sand System has not been requested.

#### *Monitoring/Recordkeeping*

Grede is required to continuously monitor and record the Large Wet Dust Collector differential pressure and fan amperage as part of the Compliance Assurance Monitoring (CAM) plan. These operating parameters are continuously monitored from a control panel and manually recorded once per day. Records were provided for the weeks of 7/16/2023 and 6/2/2024 verifying the data is recorded once per day.

In addition, the facility is required to monitor and record visible emissions observations from the Large Wet Dust Collector on a daily basis. Compliance with these required records were verified by requesting daily records for the weeks 7/16/2023 and 6/2/2024. The records provided and reviewed indicate the fan amperage was between 122-137 amps, the differential pressure across the baghouse was between 2.0 – 4.0 in WC, and no visible emissions were detected from the stack of the Large Wet Dust Collector.

As part of the O & M Plan, Grede keeps records of preventive maintenance (PM) performed on the Large Wet Dust Collector. A monthly PM record was provided for the months May 2023 and February 2024. The record notes the items inspected, the condition, and if a work order was needed. Grede appears to be maintaining the Large Wet Dust Collector according to the O & M Plan.

Grede is required to maintain records of PM10 emissions from the Main Plant Sand System on a 12-month rolling time period. For PM10 calculations, the facility is using a stack test emission factor. Using the PM10 emission rate from the 2005 stack test and the 12-month rolling sand throughput, the facility calculates PM10 emissions on a 12-month rolling basis. For the period June 2023 through May 2024, total PM10 emissions were 0.599 tons. A review of the previous 12-month rolling totals are all below 5.56 tpy.

### *Reporting*

A review of the 2023 compliance and deviation reports show 1 deviation was reported for EU-P012. On 9/12/23 the differential pressure gauge was reading 0" WC due to the line being plugged. The line was blew out and returned to normal operation.

### *Stack/Vent Restrictions*

After collecting the monitoring parameters data, AQD and Grede staff proceeded to the roof of the facility to inspect the wet collector and stack. At the time of the inspection, the wet collector was operating and no visible emissions were observed.

### EU-P014 Main Plant Finishing

This emission unit include all activities associated with casting finishing conducted in the Main Plant. These processes include grinding, chipping, and tumble blasting (Wheelabrators). The process exhaust is collected by three pulse-jet baghouses: East Fuller, West Fuller, and Steelcraft.

### *Emission/Material Limits*

The Main Plant Finishing contains PM and PM10 emission limits that are made practically enforceable through proper operation and maintenance of the three baghouses, monitoring of pressure drop across each baghouse, monitoring fan amperage for each baghouse, monitoring of visible emissions from each baghouse, and emissions testing if requested.

### *Process/Operational Restrictions*

Grede maintains an O & M Plan (Rev. 12/15/2021) for the Main Plant Finishing and associated control equipment. The facility is required to continuously monitor and maintain the proper operation of each baghouse for Main Plant Finishing. Performance monitoring parameters with ranges of proper operation and observed data from control panels during the inspection are outlined in the table below.

Parameter	Range	Observed (11:01 AM CST)
Steelcraft baghouse fan	145 – 165 Amps	146 Amps
Steelcraft baghouse d.p.	3.5 – 5.5 in WC minimum	4.8 in WC

Parameter	Range	Observed (11:04 AM CST)
East Fuller baghouse fan	100 – 120 Amps	102 Amps
East Fuller baghouse d.p.	5.0 – 7.0 in WC minimum	6.8 in WC

Parameter	Range	Observed (11:04 AM CST)
West Fuller baghouse fan	120 – 140 Amps	128 Amps
West Fuller baghouse d.p.	5.0 – 7.0 in WC minimum	5.3 in WC

### *Testing/Sampling*

Verification of PM and PM10 emission rates from the Main Plant Finishing has not been requested.

### *Monitoring/Recordkeeping*

Grede is required to continuously monitor differential pressure and fan amperage from the East Fuller, West Fuller, and Steelcraft baghouses and record once per day as part of the Compliance

Assurance Monitoring (CAM) plan. These operating parameters are continuously monitored from control panels that display the current fan amperage and differential pressure. Records were requested for the weeks 9/10/2023 and 3/17/2024 to show compliance with these requirements. The records reviewed show the parameters being recorded daily during operation and within the indicator ranges.

In addition, the facility is required to monitor and record visible emissions observations from each of the three baghouses on a daily basis. Compliance with these required records were verified by requesting daily records for the weeks 9/10/23 and 3/17/24. The records provided and reviewed indicate all operating parameters were within the respected ranges for proper operation.

As part of the O & M Plan, Grede keeps records of preventive maintenance (PM) performed on the Steelcraft, West Fuller, and East Fuller baghouses. Monthly PM records were provided for March 2024. The records note the items inspected, the condition, and if a work order was needed. Based on the records reviewed and observations on-site, Grede appears to be maintaining the finishing baghouses according to the O & M Plan.

Grede is required to maintain records of PM10 emissions from the Main Plant Finishing on a 12-month rolling time period. For PM10 calculations, the facility is using a PM10 MAERS emission factor and control efficiency of 99% for the baghouses. For the period June 2023 through May 2024, PM10 emissions were 0.147 tons. A review of the previous 12-month rolling totals are all below 1.45 tpy.

### *Reporting*

A review of the 2023 compliance and deviation reports show 3 deviations reported for EU-P014. Description of deviations and corrective actions were provided.

### *Stack/Vent Restrictions*

After collecting the monitoring parameters data, AQD and Grede staff proceeded outside of the facility to inspect the Steelcraft, West Fuller, and East Fuller for visible emissions. At the time of the inspection, all three baghouses were in operation and no visible emissions were observed.

### EU-P016 Main Plant Pouring and Cooling

Process includes all activities associated with the pouring and cooling of molten iron on six mold lines in the Main Plant. Molten iron is supplied by a 20-ton Brown Boveri holding furnace that

receives molten iron from the cupola. There is no emission control equipment associated with this emission unit.

### *Emission/Material Limits*

Main Plant Pouring and Cooling is subject to PM10 emission limits. These limits are practically enforceable through proper operation and maintenance, emission calculations, and emissions testing if requested.

### *Process/Operational Restrictions*

At the time of the inspection, 5 of 6 mold lines were in operation and appeared to be operating properly. No changes to the mold lines have occurred since the last inspection.

### *Testing/Sampling*

Testing has not been requested for verification of PM10 emission rates from Main Plant Pouring and Cooling.

### *Monitoring/Recordkeeping*

Grede is required to maintain records of PM10 emissions from the Main Plant Pouring and Cooling on a 12-month rolling time period. For PM10 calculations, the facility is using a PM (Filterable) stack test emission factor from the December 2020 stack test and taking the ratio of PM10 to PM emission factors from the DEQ Foundry Factsheet (11/05) to calculate a PM10 emission factor for Main Plant Pouring and Cooling. For the period June 2023 through May 2024, PM10 emissions were 0.6010 tons.

### *Stack/Vent Restrictions*

The ROP currently has listed stacks 324176, 324188, 324196, and 324204 for Main Plant Pouring and Cooling. These stacks were previously part of the "Summit" cooling line. Modifications to these stacks were completed in 2019, where the connecting hoods and duct work were removed at the roofline rendering the stacks to becoming general ventilation. These stacks are for general ventilation only and are not capturing emissions from the Main Plant Pouring and Cooling processes any longer. For MACT EEEEE compliance, these stacks are not applicable since the modifications have rendered the stacks to being general building ventilation and are not discharging emissions to the atmosphere through conveyance. These stacks have been removed from EU-P016 Main Plant Pouring and Cooling through PTI No. 28-22.

The following table summarizes the stacks/vents observed as part of the Main Plant Pouring and Cooling.

Stack/Vent	Description
324636	Stack associated with Hunter No.5 cooling conveyor
324632	Stack associated with Hunter No.6 pouring
324662	Stack associated with Hunter No.7 pouring
324678	Stack associated with Disa Forma pouring
324682	Stack associated with Disa Forma pouring
324484	Stack associated with Disa Forma cooling
324848	Stack associated with Hunter No. 5 pouring
324666	Stack associated with Hunter No. 7 cooling
324844	Not currently listed in the ROP. This stack is associated with the No.5 cooling conveyor.

Each of these stack outlets were observed from the roof of the facility during the inspection. No visible emissions were detected. The table below lists the stacks/vents that were removed from Main Plant Pouring and Cooling through PTI No. 28-22.

Stack/Vent	Description
324308	Stack associated with the shake cooling conveyor. Moved to Main Plant Shakeout.

<b>324176</b>	<b>General ventilation, flush with roofline.</b>
<b>324188</b>	<b>General ventilation, flush with roofline</b>
<b>324196</b>	<b>General ventilation, flush with roofline</b>
<b>324204</b>	<b>General ventilation, flush with roofline</b>
<b>324452</b>	<b>General ventilation, flush with roofline, no conveyance. This use to be part of Hunter No. 8 cooling.</b>
<b>324476</b>	<b>This stack is associated with the Disa Forma line but does not vent pouring or cooling emissions</b>
<b>324304</b>	<b>Stack associated with the shake cooling conveyor. Moved to Main Plant Shakeout.</b>
<b>324312</b>	<b>Stack associated with the shake cooling conveyor. Moved to Main Plant Shakeout.</b>
<b>324640</b>	<b>Stack associated with the shake cooling conveyor. Moved to Main Plant Shakeout.</b>
<b>324296</b>	<b>Stack associated with the shake cooling conveyor. Moved to Main Plant Shakeout.</b>
<b>324300</b>	<b>Stack associated with the shake cooling conveyor. Moved to Main Plant Shakeout.</b>

Stack #324844 is part of the Hunter No.5 cooling line and is currently not listed in the ROP. This stack was added through PTI No. 28-22. Stacks 324176, 324188, 324196, 324204, and 324452 are general ventilation stacks with no duct work connected to any processes and have vent openings flush with the roofline. These stacks were removed from Main Plant Pouring and Cooling through PTI No. 28-22.

#### EU-P018 Main Plant Shakeout

Castings, gates, risers, and sand are mechanically separated by shaking in the Main Plant. The shakeout receives the materials from the end of the dump conveyor. The Main Plant Shakeout process is controlled with two fabric filter baghouses (Torit and Linsmeyer).

#### *Emission/Material Limits*

The Main Plant Shakeout contains PM, PM10, and PM2.5 emission limits that are made practically enforceable through proper operation and maintenance of the baghouses, monitoring of pressure drop across each baghouse, monitoring fan amperage for each baghouse, monitoring of visible emissions from each baghouse, and emissions testing if requested.

#### *Process/Operational Restrictions*

Grede maintains an O & M Plan (Rev. 12/15/2021) for the Main Plant Shakeout and associated control equipment. The facility is required to continuously monitor and maintain the proper operation of each baghouse for Main Plant Shakeout. Performance monitoring parameters with ranges of proper operation and observed data from control panels during the inspection are outlined in the table below.

Parameter	Range	Observed (10:48 AM CST)
Linsmeyer baghouse fan	55 – 85 Amps	74 Amps
Linsmeyer baghouse d.p.	3.0 – 7.0 in WC minimum	3.5 in WC

Parameter	Range	Observed (10:48 AM CST)
Torit baghouse fan	175 – 210 Amps	178 Amps
Torit d.p.	1.0 – 6.0 in WC minimum	4.9 in WC

#### *Design/Equipment Restrictions*

EU-P018 Main Plant Shakeout contains a requirement to not operate the process unless the fabric filter baghouses are installed, maintained, and operated in a satisfactory manner. Each baghouse

is also required to be equipped with differential pressure gauges. During the inspection, the Linsmeyer and Torit #1 baghouses were installed and operational.

### ***Testing/Sampling***

Verification of PM, PM10, and PM2.5 emission rates from the Main Plant Shakeout has not been requested.

### ***Monitoring/Recordkeeping***

Grede is required to continuously monitor and record the differential pressure and fan amperage from the Torit #1 and Linsmeyer baghouses as part of the Compliance Assurance Monitoring (CAM) plan. These operating parameters are continuously monitored from control panels that display the current fan amperage and differential pressure. In addition, the facility is required to monitor and record visible emissions observations from each of the three baghouses on a daily basis. Compliance with these required records were verified by requesting daily records for the weeks 9/10/2023 and 3/17/2024. The records provided and reviewed indicate all operating parameters were within the respected ranges for proper operation.

As part of the O & M Plan, Grede keeps records of preventive maintenance (PM) performed on the IM Torit and Linsmeyer. Monthly PM records were provided for January 2024. The records note the items inspected, the condition, and if a work order was needed. Based on the records reviewed and observations on-site, Grede appears to be maintaining the Main Plant Shakeout baghouses according to the O & M Plan.

Grede is required to maintain records of PM10 emissions from the Main Plant Shakeout on a 12-month rolling time period. For PM10 calculations, the facility is using an EPA Webfire emission factor and control efficiency of 99%. For the period June 2023 through May 2024, PM10 emissions were 0.29 tons.

### ***Reporting***

A review of the 2023 compliance and deviation reports show no deviations reported for EU-P018.

### ***Stack/Vent Restrictions***

The Linsmeyer and Torrit #1 baghouses were operating at the time of the inspection. No visible emissions were observed.

## **EU-P021 Isocure**

Production of phenolic urethane coldbox (Isocure) cores in the Main Plant using dimethylethylamine. Isocure is a cold box process (no heat is applied). Core sand is mixed with a 2-part phenolic urethane liquid resin. Sand and resin are mixed in three mullers prior to addition to the core machines. A catalyst, dimethylethylamine (DMEA) gas, is introduced into the core box and purged through the core with superheated air. The cores are produced on ten Isocure core machines. After the Isocure Core is produced, it is generally dipped in a water-based core wash. The core wash is a suspension of fine clay or graphite that is applied to a core in metal casting to improve that portion's cast surface.

The cores are then dried in the Core Washing Oven. The heat source for the oven is natural gas combustion. The temperature of the oven can range up to 400°F. The oven is vented through a stack that exhausts above the building roof. Grede is currently using one of two core washes in the Main Plant Isocure Coremaking process. These coatings are identified as Techni Kote 8282 (HA International Inc.) and Dura Kote FCZ (also a HA International Inc. product). Techni Kote 8282 is a water-based refractory coating that combines a ceramic refractory with graphite. It provides protection from metal penetration in medium to heavy section iron castings. The only compounds present in the core wash above 1% composition are quartz (SiO<sub>2</sub>), mica, and Kaolin. The coating's vapor pressure is 23 mbar or 17.25 mm of Hg. Dura Kote FCZ is a high solids zircon/ceramic blend refractory coating, designed for medium to heavy castings. It is effective in the reduction of veining, burn-in and burn-on in large gray iron castings. The only compounds present in the core wash are zircon (Zr(SiO<sub>4</sub>)), Fuller's Earth, Quartz (SiO<sub>2</sub>), and titanium dioxide. The coating's vapor pressure is 23 mbar or 17.25 mm of Hg.

The Main Plant Isocure mullers and sand silo emissions are controlled by a baghouse. Emissions from the Main Plant Isocure core machines are controlled by a cartridge filter followed by an acid scrubber.

### ***Emission/Material Limits***

The Isocure process contains DMEA, PM, PM<sub>10</sub>, and VOC emission limits that are made practically enforceable through proper operation and maintenance of the baghouse and acid scrubber, along with emissions testing if requested.

### ***Process/Operational Restrictions***

Grede maintains an Operations & Maintenance Plan (Rev. 12/15/2021) for the Isocure process and associated control equipment. The facility is required to continuously monitor and maintain the proper operation of the Flex-Kleen baghouse and acid scrubber. The facility is required to monitor the actual PH and flow rate once per shift from the acid scrubber. Performance monitoring parameters with ranges of proper operation and observed data from control panels during the inspection are outlined in the table below.

Parameter	Range	Observed (10:16 AM CST)
Acid scrubber PH	0 – 4.5	4
Acid scrubber flow rate	80 – 130 gpm	80 gpm

### *Testing/Sampling*

Verification of PM, PM10, DMEA, and VOC emission rates from the Main Plant Isocure has not been requested.

### *Monitoring/Recordkeeping*

Grede is required to maintain records of PM10, DMEA, and VOC emissions from the Main Plant Isocure on a 12-month rolling time period. For PM10 emission calculations from the Isocure core making process and sand mullers, the facility is using PM10 stack test emission factors from a 2005 test. For the period June 2023 through May 2024, PM10 emissions were 0.008 tons from the core making process and 0.011 tons from the sand mullers. For VOC emissions from the core machines, the facility is using a VOC stack test emission factor from a 2005 stack test. For the period June 2023 through May 2024, VOC emissions were 0.04 tons from the core machines, DMEA emissions were 0.0100 tons.

### *Stack/Vent Restrictions*

Stacks #324596 and #324598 from the acid scrubber were observed from the roof. No visible emissions were observed. Stack #324687 from the baghouse was observed and no visible emissions were detected.

### EU-P032 Module Sand System, EU-P034 Module Finishing, EU-P038 Module Shakeout

The Module Sand System process includes activities associated with the collection and distribution of mold sand used in the Module Plant. These activities include the Module Sand Muller, collection of spill sand, screening of used sand, and conveying sand.

The Module Finishing process is defined as the collection of dust from all activities associated with metal finishing conducted in the Module Plant. These activities include grinding, chipping, and hang blast (Wheelabrators).

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The Module Shakeout process includes the mechanical separation of castings, gates, risers, and sand by shaking in the Module Plant.

All three processes exhaust to the Torit baghouse. The Torit baghouse is a CAM subject control device.

#### *Emission/Material Limits*

These three Module processes contain PM and PM10 emission limits that are made practically enforceable through proper operation and maintenance of the Torit baghouse, monitoring of pressure drop across the Torit baghouse, monitoring fan amperage for the Torit baghouse, monitoring of visible emissions from the Torit baghouse, and emissions testing if requested.

#### *Process/Operational Restrictions*

Grede maintains an Operations & Maintenance Plan (Rev. 12/15/2021) for the Module processes and Torit baghouse. The facility is required to continuously monitor and maintain the proper operation of the Torit baghouse. Performance monitoring parameters with ranges of proper operation and observed data from control panels during the inspection are outlined in the table below.

Parameter	Range	Observed (11:42 AM CST)
Torit baghouse fan	175 – 220 Amps	193 Amps
Torit baghouse d.p.	1.0 – 6.0 in WC	5.4 in WC

#### *Testing/Sampling*

Verification of PM and PM10 emission rates from the Module processes has not been requested.

#### *Monitoring/Recordkeeping*

Grede is required to continuously monitor and record the differential pressure and fan amperage from the Torit baghouse as part of the compliance assurance monitoring (CAM) plan. These operating parameters are continuously monitored from a control panel that displays the current

fan amperage and differential pressure. In addition, the facility is required to monitor and record visible emissions observations from the Torit baghouse on a daily basis. Compliance with these required records were verified by requesting daily records for the weeks of 7/16/23 and 6/2/24. The records provided and reviewed indicate all operating parameters were within the respected ranges for proper operation.

As part of the O & M Plan, Grede keeps records of preventive maintenance (PM) performed on the Module Torit baghouse. Monthly PM records were provided for March 2023. The records note the items inspected, the condition, and if a work order was needed. Based on the records reviewed and observations on-site, Grede appears to be maintaining the Module Torit baghouse according to the O & M Plan.

Grede is required to maintain records of PM10 emissions from the Module Sand System, Shakeout, and Finishing on a 12-month rolling time period. For the period June 2023 through May 24, PM10 emissions were 3.712 tons from Sand System, 0.034 tons from Finishing, and 0.0495 tons from Shakeout.

#### *Stack/Vent Restrictions*

During the inspection, the stack to the Torit baghouse was observed to check for visible emissions. No visible emissions were observed.

#### EU-P036 Module Pouring and Cooling

Process includes all activities associated with the pouring and cooling of molten iron on one Hunter mold line in the Module Plant. Molten iron is supplied by a 20-ton Brown Boveri holding furnace that receives molten iron from the cupola. There is no emission control equipment associated with this emission unit. This emission unit is subject to MACT EEEEE.

#### *Emission/Material Limits*

Module Pouring and Cooling is subject to PM10 emission limits. These limits are practically enforceable through proper operation and maintenance, emission calculations, and emissions testing if requested.

#### *Process/Operational Restrictions*

At the time of the inspection, the Hunter mold line was in operation and appeared to be operating properly.

### ***Testing/Sampling***

Testing has not been requested for verification of PM10 emission rates from Module Pouring and Cooling.

### ***Monitoring/Recordkeeping***

Grede is required to maintain records of PM10 emissions from the Module Plant Pouring and Cooling on a 12-month rolling time period. For PM10 calculations, the facility is using a PM (Filterable) stack test emission factor from the December 2020 stack test and taking the ratio of PM10 to PM emission factors from the DEQ Foundry Factsheet (11/05) to calculate a PM10 emission factor for Module Plant Pouring and Cooling. For the period June 2023 through May 2024, PM10 emissions were 0.106 tons.

### ***Stack/Vent Restrictions***

The three Module Pouring and Cooling stacks were inspected on the roof for visible emissions. No visible emissions were observed.

### **EU-P040 Sand Conditioning System**

Process represents the activities associated with the conditioning of mold sand used in the Main Plant. The process cools hot sand to approximately 120 degrees Fahrenheit or less while maintaining grain distribution and bond addition. A Steelcraft baghouse collects the emissions from all of the sand handling activities which include screening operations, storage silos, cooling and mixing, and the cyclone separator.

### ***Emission/Material Limits***

The Sand Conditioning System contains PM and PM10 emission limits that are made practically enforceable through proper operation and maintenance of the Steelcraft baghouse, monitoring of pressure drop across the baghouse, monitoring fan amperage for the baghouse, monitoring of visible emissions from the baghouse, and emissions testing if requested.

### ***Process/Operational Restrictions***

Grede maintains an Operations & Maintenance Plan (Rev. 12/15/2021) for the Sand Conditioning System and associated control equipment. The facility is required to continuously monitor and maintain the proper operation of the baghouse for the Sand Conditioning System. Performance monitoring parameters with ranges of proper operation and observed data from the control panel during the inspection are outlined in the table below.

Parameter	Range	Observed (10:31 AM CST)
Steelcraft baghouse fan	110 – 160 Amps	122 Amps
Steelcraft baghouse d.p.	3.5 – 5.5 in WC minimum	4.6 in WC

### *Testing/Sampling*

Verification of PM and PM10 emission rates from the Sand Conditioning System has not been requested.

### *Monitoring/Recordkeeping*

Grede is required to continuously monitor and record the differential pressure and fan amperage from the Steelcraft baghouse as part of the compliance assurance monitoring (CAM) plan. These operating parameters are continuously monitored from a control panel that displays the current fan amperage and differential pressure. In addition, the facility is required to monitor and record visible emissions observations from the Steelcraft baghouse on a daily basis. Compliance with these required records were verified by requesting daily records for the weeks 7/16/23 and 6/2/2024. The records provided and reviewed indicate all operating parameters were within the respected ranges for proper operation.

As part of the O & M Plan, Grede keeps records of preventive maintenance (PM) performed on the Sand Conditioning System baghouse. Monthly PM records were provided for May 2024. The records note the items inspected, the condition, and if a work order was needed. Based on the records reviewed and observations on-site, Grede appears to be maintaining the Sand Conditioning System baghouse according to the O & M Plan.

Grede is required to maintain records of PM10 emissions from the Sand Conditioning System on a 12-month rolling time period. For the period June 2023 through May 2024, PM10 emissions were 0.7365 tons.

### *Stack/Vent Restrictions*

During the inspection, the stack to the Steelcraft baghouse was observed to check for visible emissions. No visible emissions were observed.

EU-P041 Main Plant Bond Silo, EU-P042 Module Bond Silo

Main Plant Bond Silo process represents the loading of bond into the Main Plant Bond Silo, which is located external to the plant. The bond is used in the Main Plant. A Rumelin bin vent filter controls emissions generated during loading. The bin vent filter vents into the plant environment.

The Module Bond Silo process represents the loading of bond into the Module Bond Silo. The bond is used in the Module Plant. A Flex Kleen bin vent filter controls emissions generated during loading. The Flex Kleen bin vent filter exhausts into the plant environment.

#### *Emission/Material Limits*

The Main Plant and Module Bond Silo processes contain a PM emission limits that is made practically enforceable through proper operation and maintenance of the bin vent filters, and emissions testing if requested.

#### *Process/Operational Restrictions*

At the time of the inspection, the bond silos were in operation and appeared to be operating properly.

#### *Testing/Sampling*

Testing has not been requested for verification of PM10 emission rates from Module Pouring and Cooling.

#### EU-P043 Module Isocure

Production of phenolic urethane coldbox (Isocure) cores in the Module Plant using dimethylethylamine. Isocure is a cold box process (no heat is applied). Core sand is mixed with a 2-part phenolic urethane liquid resin. Sand and resin are mixed in a muller prior to addition to three core machines. A catalyst, dimethylethylamine (DMEA) gas, is introduced into the core box and purged through the core with superheated air. The cores are produced on three Isocure core machines.

After the Isocure Core is produced, it is generally dipped in a water-based core wash. The core wash is a suspension of fine clay or graphite that is applied to a core in metal casting to improve that portion's cast surface. The cores are then dried in the Core Washing Oven. The heat source for the oven is natural gas combustion. The temperature of the oven can range up to 400°F. The oven is vented through a stack that exhausts above the building roof. Grede is currently using one of two core washes in the Module Plant Isocure Coremaking process. These coatings are identified as Techni Kote 8282 (HA International Inc.) and Dura Kote FCZ (also a HA International

Inc. product). Techni Kote 8282 is a water-based refractory coating that combines a ceramic refractory with graphite. It provides protection from metal penetration in medium to heavy section iron castings. The only compounds present in the core wash above 1% composition are quartz (SiO<sub>2</sub>), mica, and Kaolin. The coating's vapor pressure is 23 mbar or 17.25 mm of Hg. Dura Kote FCZ is a high solids zircon/ceramic blend refractory coating, designed for medium to heavy castings. It is effective in the reduction of veining, burn-in and burn-on in large gray iron castings. The only compounds present in the core wash are zircon (Zr(SiO<sub>4</sub>)), Fuller's Earth, Quartz (SiO<sub>2</sub>), and titanium dioxide. The coating's vapor pressure is 23 mbar or 17.25 mm of Hg.

The Module Plant Isocure miller and sand silo emissions are controlled by the Torit baghouse. Emissions from the Module Plant Isocure core machines are controlled by a cartridge filter followed by an acid scrubber.

#### *Emission/Material Limits*

The Isocure process contains DMEA, PM, PM<sub>10</sub>, and VOC emission limits that are made practically enforceable through proper operation and maintenance of the baghouse and acid scrubber, along with emissions testing if requested.

#### *Process/Operational Restrictions*

Grede maintains an Operations & Maintenance Plan (Rev. 12/15/2021) for the Isocure process and associated control equipment. The facility is required to continuously monitor and maintain the proper operation of the Torit baghouse and acid scrubber. The facility is required to monitor the actual PH and flow rate once per shift from the sulfuric acid scrubber. Performance monitoring parameters with ranges of proper operation and observed data from control panels during the inspection are outlined in the table below.

Parameter	Range	Observed (10:35 AM CST)
Acid scrubber PH	0 – 4.5	3.5
Acid scrubber flow rate	25 – 45 gpm	33 gpm

#### *Testing/Sampling*

Verification of PM, PM<sub>10</sub>, DMEA, and VOC emission rates from the Main Plant Shakeout has not been requested.

### ***Monitoring/Recordkeeping***

Grede is required to continuously monitor and record the differential pressure from the Torit baghouse during production operations and record the actual pH and flow rate of the acid scrubber once per shift. These operating parameters are continuously monitored from a control panel for the differential pressure across the Torit baghouse and gauges equipped on the acid scrubber for pH and flow rate. Compliance with these required records were verified by requesting daily records for the weeks 7/16/2023 and 6/2/2024. The records provided and reviewed indicate all operating parameters were within the respected ranges for proper operation.

As part of the O & M Plan, Grede keeps records of preventive maintenance (PM) performed on the Module GFE Scrubber. Monthly PM records were provided for March 2022. The records note the items inspected, the condition, and if a work order was needed. Based on the records reviewed and observations on-site, Grede appears to be maintaining the Module GFE Scrubber according to the O & M Plan.

Grede is required to maintain records of PM10, DMEA, and VOC emissions from the Module Isocure on a 12-month rolling time period. For PM10 emission calculations from the Isocure core making process and sand mullers, the facility is using PM10 stack test emission factors from a 2005 test. For the period July June 2023 through May 2024, PM10 emissions were 0.002 tons from the core making process and 0.0005 tons from the sand mullers. VOC emissions were 0.0095 tons from the core machines and DMEA emissions were 0.0005 tons.

### ***Stack/Vent Restrictions***

Stacks from the acid scrubber were observed from the roof. No visible emissions were observed.

### **FG-MACTEEEE**

Grede is subject to the Iron and Steel Foundry MACT, Subpart EEEEE, since the facility is considered a major source of HAPs. The regulations cover emissions from metal melting furnaces, scrap preheaters, new pouring areas, pouring stations, new automated conveyor and new pallet cooling lines, new automated shakeout lines, mold and core making lines, and fugitive emissions from foundry operations. The affected emission units at the source that are subject to MACT EEEEE include EU-009 Cupola, EU-016 Main Plant Pouring and Cooling, EU-P036 Module Pouring and Cooling, and any fugitive emissions.

### ***Emission/Material Limits***

MACT EEEEE contains PM and VOHAP limits for the cupola and PM limits for Main Plant and Module Pouring and Cooling. The federal regulation also contains a fugitive opacity limit for each building or structure that houses an affected emission unit. Compliance with these emission limits is demonstrated through testing, monitoring and recording of performance parameters, and control device inspections and maintenance.

### *Process/Operational Restrictions*

Grede maintains an operations and maintenance plan that includes responsible personnel, inspection schedule, recording of monitoring parameters, and predictive maintenance. The pouring and cooling processes do not have any associated air pollution control equipment. The cupola contains operating limits for the afterburner temperature, baghouse fan amperage, and baghouse differential pressure. These limits are listed in the O&M Plan. The O&M Plan also lists the cupola startup process, charging process, tap out process, and draining the cupola. The plan lists what constitutes a shutdown of the cupola along with normal operating conditions following the startup of the cupola. The cupola will shutdown if the upper stack temperature reaches above 1900 degrees Fahrenheit and the baghouse inlet temperature reaches above 530 degrees Fahrenheit.

After the coke bed has been burned, normal operating conditions include the baghouse blower motor current between 115 to 281 amps, the combustion zone temperature at a minimum of 1300 degrees Fahrenheit, and the baghouse inlet temperature between 360 to 495 degrees Fahrenheit. During the inspection, these normal operating parameters were observed from the control system. The combustion zone temperature was being maintained above 1300 degrees Fahrenheit during “on-blast” status of the cupola.

Grede has a scrap certification and selection plan pursuant to 40 CFR 63.7700(b) and 40 CFR 63.7700(c). Grede certifies they only purchase and operate with prepared scrap or other materials that do not include: post-consumer automotive body scrap, dust, dirt, rust, debris, fluff, rubber, paper, cloth, plastic, engine blocks, lead (wheel weights, battery cables, pope or components, etc.). No radioactive material, mercury or mercury containing components, PCB's, batteries, and/or free liquids (per EPA Method 9095B) are allowed.

The Ground Man of the Charging team is responsible for inspecting new scrap material as its delivered. In order for the scrap steel to be acceptable, the following conditions must be met: cylindrical or bar shaped stock (especially if solid): maximum length = 20 inches, maximum diameter = 8 inches, rectangular shaped stock: maximum width = 12 inches, maximum length = 20 inches, maximum thickness = 2 inches, maximum dimension in any direction = 30 inch, no visible lead, no visible mercury devices, plastics removed to the extent practicable, no free organic liquids (oils, etc). A Steel Scrap Inspection Log is maintained for each shipment that includes a checklist for the material being sized correctly, no visible lead, no visible mercury

devices, plastics removed to the extent possible, no free organic liquids, and reason the load was rejected (if applicable). A steel scrap inspection log for 6/10/24 was reviewed during the inspection that contains the above criteria.

The O&M plan specifies inspections and maintenance for the air pollution control devices. Besides required visual inspections and recordkeeping, gauges are calibrated semi-annually, along with quarterly monitoring of fan wear, material buildup, corrosion inspections, etc. The plan states there are monthly observations of the physical appearance of the capture and ventilations system equipment (holes, dents, accumulated dust, fan condition).

#### *Design/Equipment Parameters*

The cupola is required to not be operated unless the afterburners, quench tank, and baghouse are installed, operated and maintained in accordance with the approved O&M Plan. At the time of the inspection, all air pollution control equipment was in operation.

#### *Testing/Sampling*

Testing for PM, VOHAP, opacity, and total metal HAP was last performed during December 12 – 15, 2023. Main Plant and Module Plant pouring and cooling passed for PM, and the cupola passed PM, VOHAP, and fugitive opacity limits. Testing against these limits is next required by December 2028.

TEST PARAMETERS		
Test Locations	Test Dates	Test Parameters
EU-P009 Cupola	12/12/2023 – 12/15/2023	Particulate Matter (PM), Opacity, VOHAP
EU-P016 Main Plant Pouring and Cooling		PM and Opacity
EU-P036 Module Pouring and Cooling		

EU-P009 CUPOLA				
Test Location	Test Date	Test Parameter	Emission Limit	Emission Rate
Baghouse Inlet	12/14/2023	VOHAP	20 ppmvd @ 10% O <sub>2</sub>	0.25 ppmvd @ 10% O <sub>2</sub>
Monovent Baghouse Exhaust	12/14/2023	PM	0.006 gr/dscf	0.0010 gr/dscf
		Opacity	≤ 20%	0%

EU-P016 MAIN PLANT POURING AND COOLING				
Test Location	Test Date	Test Parameter	Emission Limit	Emission Rate
SV-S016-324632	12/13/2023	PM	0.010 gr/dscf	0.0012 gr/dscf
		Opacity	≤ 20%	0%
SV-S016-324662	12/13/2023	PM	0.010 gr/dscf	0.0023 gr/dscf
		Opacity	≤ 20%	0%
SV-S016-324678	12/12/2023	PM	0.010 gr/dscf	0.002 gr/dscf
		Opacity	≤ 20%	0%
SV-S016-324682	12/12/2023	PM	0.010 gr/dscf	0.0012 gr/dscf
		Opacity	≤ 20%	0%
SV-S016-324484	12/12/2023	PM	0.010 gr/dscf	0.0058 gr/dscf
		Opacity	≤ 20%	0%
SV-S016-324848	12/13/2023	PM	0.010 gr/dscf	0.0007 gr/dscf
		Opacity	≤ 20%	0%

EU-P036 MODULE POURING AND COOLING				
Test Location	Test Date	Test Parameter	Emission Limit	Emission Rate
SV-S036-334116	12/14/2023	PM	0.010 gr/dscf	0.002 gr/dscf
		Opacity	≤ 20%	0%
SV-S036-334176	12/15/2023	PM	0.010 gr/dscf	0.0014 gr/dscf
		Opacity	≤ 20%	0%

Grede is also required to conduct fugitive opacity testing from each structure housing an emission source subject to MACT EEEEE on a semi-annual basis. Testing was last performed on April 15, 2024. Visible emissions testing was performed at the northeast corner of the cupola housing

structure and the side walls of the main building structure that houses the Main Plant Pouring and Cooling and Module Pouring and Cooling. Opacity reading averages were all below 20%.

### ***Monitoring/Recordkeeping***

Grede has a continuous monitoring system for the cupola and associated air pollution control equipment. This system was in operation during the inspection. The control system provides real time data on the operating parameters of the cupola and air pollution control equipment. The afterburner temperature, baghouse fan amperage, and baghouse differential pressure are also recorded daily.

### ***Reporting***

Grede is required to provide semiannual compliance and deviation reports for any emission limitation or operation and maintenance requirements in the subpart. According to 40 CFR 63.7751(d), the facility is allowed to include deviations from the MACT requirements in the Part 70 (Title V) compliance and deviation report. Submission of the Part 70 monitoring report satisfies any obligation to report the same deviations in the MACT EEEE semiannual report. For 2023, the facility reported they are in compliance with all the applicable emission limitations, work practice standards, and O & M requirements for the reporting period except for the deviations listed for the Cupola.

### **Source-Wide**

Covers all processes at the facility including raw material handling (metal, fluxes, metallurgical coke), metal melting, mold and core production, casting, and finishing.

### ***Emission/Material Limits***

The facility has source-wide limits for PM10 and VOCs on a 12-month rolling time period. Compliance with these limits is demonstrated through emission calculations and recordkeeping. For the period June 2023 through May 2024, total PM10 emissions were 12.6 tons and total VOC emissions were 22.5 tons. Based on the emissions reported and reviewed, Grede is in compliance with the source-wide emission limits.

### **AQD No. 2021-01**

#### **Compliance Program**

**No. 9:** Updated O&M Plan provided on 12/16/21, AQD approved.

**No.10:** EU-P009 Cupola passed SC I.1 and 3 (CO) limits in December 2020, SC I.5 (PM10) limit passed in December 2021. Facility is keeping visible emission records from cupola baghouse.

**No. 11(A):** FGMACTEEEEEE testing was conducted in December 2023. All emission rates passed. Testing is next required by December 2028.

**No. 11(B):** EU-P009 Cupola passed SC I.1 and 3 (CO), SC I.4 (PM), SC I.7 and 8 (SO<sub>2</sub>), and SC I.10 (VE) limits in December 2020. SC I.5 (PM<sub>10</sub>) limit passed in December 2021.

**No. 11(C):** Visible emissions tests being conducted semiannually, notifications being provided.

**No. 12:** Semiannual reports being provided timely. Facility is keeping records of pressure drop and fan amperage.

**No. 13:** Updated O&M Plan provided on 12/16/21, AQD approved. Updated fugitive dust plan from 12/12/2019, AQD approved.

**No.14:** Module Torit Collector is being properly operated and maintained. The facility is documenting on deviations reports when the cupola cap is opened and from reports reviewed, it's only for short periods during malfunction periods. The Isocure and Module Isocure acid scrubbers are being operated at proper pH and flow rate to the ranges specified in the ROP.

#### **Compliance**

Based on the full compliance evaluation (FCE) performed, Grede is currently in compliance with MI-ROP-B1577-2020, PTI No. 28-22, and AQD No. 2021-01.



Date Revised: \_\_\_\_\_

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# DAILY CHARGE LOG

DATE: 6/10/24

## WEIGHT VARIANCE CHECK

1. Record the weight on one complete charge.
2. Place clock number (Charger)
3. Notify Melt Supervisor if variation exceeds limits.

BED STONE: \_\_\_\_\_

TIME	CHARGE NUMBER	FRAG. STEEL	RETURN/ DUCT	PIG	COKE	ILMENTITE/ FEMN	SI CARBIDE	75% LUMP FESI	LIME STONE	CHARGER CLOCK #
842	5	1300	1200	0	245	3/3	120	20	100	07690
845	6									
848	7									
854	8									
857	9									
905	60	1300	1200	0	240*	3/2*	120	20	100	
910	1									
916	2									
922	3									
	4									
	5									
	6									
	7									
945	8									
950	9									
954	70									
959	1									
	2									
	3									
	4									
	5									
	6									

## SCALE TOLERANCE CHECK

TIME CHECKED: \_\_\_\_\_

EMPL ID NO.: \_\_\_\_\_

CHARGE SCALE:	ZERO	STEEL	RETURNS	PIGS
WEIGHT IN:				
WEIGHT OUT:				
LUMP SCALE (ACTUAL):				

FORM 030036

INITIALS OF SUPERVISOR NOTIFIED OF OUT OF TOLERANCE WEIGHTS: \_\_\_\_\_







VISIBLE EMISSION OBSERVATION FORM

Company Name <i>EGLE</i>			Observation Date <i>6/10</i>	Start Time <i>11:26</i>	End Time <i>11:34</i>
Location <i>801 S Carpenter Ave</i>			Comments		
City <i>Kingsford</i>	State <i>MI</i>	Zip <i>49802</i>	Sec	0	15
Process Equipment <i>EU-PO99 CUPOLA</i>	Operating Mode <i>Operating</i>		Min	0	5
Control Equipment <i>Exhaust</i>	Operating Mode <i>Operating</i>			5	0
Describe Emission Point <i>Exterior Lower Vent</i>				0	0
Height of Emission Point				0	0
Height Relative to Observer				0	0
Start <i>5ft</i> End <i>5ft</i>				0	0
Distance to Emission Point				0	0
Start <i>50ft</i> End <i>50ft</i>				0	0
Direction to Emission Point				0	0
Start <i>W</i> End <i>W</i>				0	0
Vertical Angle to Observation Pt				0	0
Start End				0	0
Describe Emissions				0	0
Start <i>Smoke</i> End <i>Smoke</i>				0	0
Emission Color				0	0
Start <i>Brown</i> End <i>Brown</i>				0	0
H Water Droplet Flame (Circle)				0	0
Attached Detached <i>N/A</i>				0	0
Point in The Flame At Which Opacity Was Determined				0	0
Start <i>Off</i> End <i>Off</i>				0	0
Describe Flame Background				0	0
Start <i>Exterior Wall</i> End <i>Exterior Wall</i>				0	0
Background Color				0	0
Start <i>Blue</i> End <i>Blue</i>				0	0
Sky Condition				0	0
Start <i>Fair</i> End <i>Fair</i>				0	0
Wind Speed				0	0
Start <i>15 mph</i> End <i>15 mph</i>				0	0
Wind Direction				0	0
Start <i>N</i> End <i>N</i>				0	0
Ambient Temp				0	0
Start <i>62°F</i> End <i>62°F</i>				0	0
Wet Bulb Temp				0	0
RH Percent				0	0
SOURCE LAYOUT SKETCH				0	0
				0	0
Observer's Name (Print) <i>Draw Yecmont</i>				0	0
Observer's Signature <i>Draw Yecmont</i>				0	0
Date <i>6/10/2024</i>				0	0
Organization <i>EGLE</i>				0	0
Certified by				0	0
Date				0	0
Additional Information				0	0
Continue on reverse side				0	0

NAME *Michael Kaplan*

DATE 7-31-2024

SUPERVISOR *Michael Kaplan*