

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : ASAMA COLDWATER MANUFACTURING, INC.	SRN : N5814
Location : 180 ASAMA PARKWAY	District : Kalamazoo
	County : BRANCH
City : COLDWATER State: MI Zip Code : 49036	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Rex Lane
FCE Begin Date : 9/16/2013	FCE Completion Date : 9/24/2014
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/16/2014	Self Initiated Inspection	Non Compliance	Self Initiated Inspection Summary

Activity Date	Activity Type	Compliance Status	Comments
09/10/2014	ROP Semi 1 Cert	Compliance	<p>Review of ROP Semi-annual Certification Report: 1/1/14 - 6/30/14</p> <p>ROP certification report contains an original dated signature by the facility's responsible official. The report identifies one deviation related to performing a late semi-annual Method 9 opacity test. The last semi-annual VE test was done on 10/15/13 and this VE test should have been completed on or before 4/15/14. ACM's EHS coordinator resigned in late February 2014 and the facility has recently hired a consultant and a new staff person to address MACT and ROP requirements. Their consultant notified staff via email that a compliance calendar is being established for tracking VE testing and other compliance requirements specified in the ROP and MACT. The semi-annual VE test was completed on 6/6/14. Although the semi-annual VE test was not done timely, it is the first occurrence at this facility and no opacity was noted during the most recent observation. Staff is inclined to use discretion for this incident and not cite the facility based on the listed circumstances and because the facility is already operating under an AQD administrative consent order for other violations.</p>
07/10/2014	ROP Other	Compliance	<p>EU-MCS: Cylinder Gas Audit (CGA) Report</p> <p>Report includes an ROP certification report that contains an original dated signature by the facility's responsible official. According to the CGA report, the audit was performed by Altech Environmental on 6/20/14 and results were within accuracy limits specified in 40 CFR Part 60, Appendix F. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
06/30/2014	MACT (Part 63)	Compliance	<p>Method 9 Performance Test Results</p> <p>Pursuant to 40 CFR 63.7731(b), the facility is required to conduct performance tests to demonstrate compliance with the opacity limit in 63.7690(a)(7) for the iron and steel foundry no less frequently than once every six months. Visible emission (VE) observations were done from the building enclosing FG-NEWFOUNDRY. Readings were done plant wide by an observer that has met and is currently certified under the specification of Federal Reference Method 9. Results indicate that there was zero percent opacity during the observation periods. A follow up report was received on 6/26/14 that included an ROP certification report signed and dated by the facility's responsible official.</p> <p>The last semi-annual VE test was done on 10/15/13 and this VE test should have been completed on or before 4/15/14. ACM's EHS coordinator resigned in late February 2014 and the facility has recently hired a consultant and a new staff person to address MACT and ROP requirements. Their consultant notified staff via email that a compliance calendar is being established for tracking VE testing and other compliance requirements specified in the ROP and MACT. Although the semi-annual VE test was not done timely, it is the first occurrence at this facility and no opacity was noted during the most recent observation. Staff is inclined to use discretion for this incident and not cite the facility based on the listed circumstances and because the facility is already operating under an AQD administrative consent order for other violations.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/28/2014	ROP Annual Cert	Compliance	<p>Annual ROP Certification Report 1/1/13 - 12/31/13:</p> <p>Report contains an original dated signature by the facility's responsible official. The report indicates that the source was in compliance with all ROP terms and conditions during the reporting period. However, staff notified the facility via email on 3/24/14 that a deviation should have been reported for the first six-month reporting period in calendar year 2013 for VOHAP exceedances from EU-MCS. An amended ROP certification report was received on 5/27/14 and included a deviation report that stated that ACM had completed installation of a Regenerative Thermal Oxidizer to control VOHAP emissions from EU-MCS. -RIL</p>
05/28/2014	ROP SEMI 2 CERT	Compliance	<p>Semi-annual ROP certification report for 7/1/13 through 12/31/13</p> <p>Report contains an original dated signature by the facility's responsible official. The report states that the source was in compliance with all ROP terms and conditions during the reporting period. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
05/16/2014	MAERS	Compliance	<p>Review of 2013 MAERS Report:</p> <p>3/24/14: Revised email and phone contact information on the EI and Fee Contact forms from the former HSE contact to the new contact, Mr. David Sutherland, Human Resources Manager.</p> <p>Changed Source Form HAPs flag from synthetic minor to major as facility is subject to 40 CFR Part 63, Subpart EEEEE. Checked MACT field on the emission unit form for applicable melting and pouring processes.</p> <p>Facility made a PM10 filterable emission calculation error for EU-SS (new) under SCC 30400352 that resulted in under reporting by about 10% and this was corrected and the report resubmitted. The previous year emission comparison audit report showed possible discrepancies with reported VOC emissions for RG-MCSCCF1 and RGSANDSYSTEM. Upon further review, the large VOC reduction (~50%) on RG-MCSCCF1 was associated with installation of RTO controls on EU-MCS beginning in July 2013. For RGSANDSYSTEM, the roughly 40% increase in VOC emissions was due to the emission basis changing from stack test in 2012 to MAERS EF for 2013. The stack test basis was based on VOC testing of the sand system for the new foundry and RGSANDSYSTEM is associated with sand handling in the older George Fischer foundry. Therefore, it would be more appropriate to use MAERS emission factor until EU specific testing is performed. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
01/28/2014	ROP SEMI 2 CERT	Compliance	<p>ROP Semi-annual Compliance Certification Report: 7/1/13 - 12/31/13</p> <p>The ROP certification report was timely and contains an original signature by the facility's responsible official. The report states that the facility complied with all terms and conditions of their ROP and PTI No. 280-06A, 280-06B and 177-11 during the reporting period.</p>
01/28/2014	MACT (Part 63)	Compliance	<p>NESHAP EEEEE Iron and Steel Foundries</p> <p>Facility cover letter states that there were no deviations from the Iron and Steel MACT standard during the reporting period. The ROP certification report contains an original signature by the facility's responsible official and the other report certification box is checked and references 40 CFR Part 63, Subpart EEEEE.</p>
01/28/2014	MACT (Part 63)	Compliance	<p>NESHAP MMMM Surface Coating of Miscellaneous Metal Parts and Products</p> <p>Facility cover letter states that ACM relied on the compliance material option during the reporting period and that there were no deviations from the MACT standards. The ROP certification report contains an original signature by the facility's responsible official and the other report certification box is checked and references 40 CFR Part 63, Subpart MMMM.</p>

Activity Date	Activity Type	Compliance Status	Comments
12/05/2013	Stack Test	Compliance	<p>EU-MCS: RATA and VOC Emissions Testing Report</p> <p>Report included a ROP certification that contains an original signature by the facility's responsible official. Testing was conducted on 9/5/13 and observed by MDEQ staff, Mr. Nathan Hude and Mr. Rex Lane and the automatic mold cooling and shakeout line appeared to be operating near maximum routine operating conditions during testing (see MACES Report N581422737). Testing was conducted to demonstrate compliance with the VOHAP limit in PTI No. 280-06B and the foundry MACT and the relative accuracy test audit (RATA) was done at the same time. Table 1-1 of the report indicates that the VOC emission rate was 5.11 ppm (VOHAP limit - 20 ppm) and 2.88 lbs./hour (permit limit - 15.49 lbs./hour) which demonstrates compliance with the foundry MACT standard and PTI No. 280-06B. Table 1-2 of the report summarizes the RATA results which indicates a relative accuracy of 7% (limit is 10% per 40 CFR Part 60). Process data was summarized in Appendix F (metal pour rate - 11 tons/hour; RTO combustion temperature - 1380 degrees F). -RIL</p>
11/12/2013	Telephone Notes	Compliance	Malfunction of CEMs Data Recorder

Activity Date	Activity Type	Compliance Status	Comments
10/28/2013	MACT (Part 63)	Compliance	<p>Method 9 Performance Test Results</p> <p>Pursuant to 40 CFR 63.7731(b), the facility is required to conduct performance tests to demonstrate compliance with the opacity limit in 63.7690(a)(7) for the iron and steel foundry no less frequently than once every six months. Visible emission observations were done from the building enclosing FG-NEWFOUNDRY. Reading were done by an observer that has met and is currently certified under the specification of Federal Reference Method 9 at three different locations for a one hour period. Results indicate that there was zero percent opacity during the observation periods.</p>

Name: RIL

Date: 9/24/14

Supervisor: MO 9/25/2014