

2700-FM-BAQ0023 2/2015 		<h1>INSPECTION REPORT</h1>		Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program	
Date(s) of Inspection: 4/28/16	TV <input type="checkbox"/> SM <input checked="" type="checkbox"/> NM <input type="checkbox"/>	PA <input type="checkbox"/> GP <input type="checkbox"/> MEGA <input type="checkbox"/>	Permit #(s): 25-00066	Expiration Date: 3/31/2019	Case #: 25-000-00066
Company Name: Accuide Corp			Municipality: Erie	County: Erie	
Plant Name: Accuide Erie / Erie Forge PIT			Physical Location: 1015 E 12th St.	Federal ID - Plant Code #: 76-0534862-1	
Responsible Official: Steven Kuhn			Mailing Address: 1015 E 12th St. Erie, PA 16503		
Title: Director of Operations					
Phone #(s): 814-480-6400					

Mark (X) All Inspection Types That Apply To This Inspection:

<input checked="" type="checkbox"/> Full Compliance Evaluation (FCE)	<input type="checkbox"/> Plan Approval Inspection	<input checked="" type="checkbox"/> File Review (FR)
<input type="checkbox"/> Operating Permit Inspection (PI)	<input type="checkbox"/> Initial Permit Inspection (IPI)	<input type="checkbox"/> Complaint Inspection (CI)
<input type="checkbox"/> Routine/Partial (RTPT)	<input type="checkbox"/> Follow-Up Inspection (Ref. Date: _____)	<input type="checkbox"/> Sample Collection (SC)
<input type="checkbox"/> Minor Source(s) Inspection (RFD)	<input type="checkbox"/> Stack Test Observation	<input type="checkbox"/> Multi-Media Inspection (MM)
<input type="checkbox"/> Other:	<input type="checkbox"/> Announced	

Annual Compliance Certification Received: YES NO N/A

Date Received:

AIMS Report Received: YES NO N/A

Date Received: 2/26/2016

Mark (X) All Activities That Apply:

<input checked="" type="checkbox"/> File Review	<input checked="" type="checkbox"/> Pre-Inspection Briefing	<input checked="" type="checkbox"/> Exit Interview/Briefing
<input checked="" type="checkbox"/> Pre-Inspection Observations	<input type="checkbox"/> Check For New/Unreported Sources	<input type="checkbox"/> Sample(s) Collected
<input type="checkbox"/> Visible Emissions Observations	<input type="checkbox"/> Verify Operation of CEMS	<input type="checkbox"/> Other

Comments/Recommendations: Enforcement since last FCE Yes No (If yes, attach summary)

This compliance inspection was conducted with Mr. Matt Brady. Facility sources and records were reviewed, results are included with the attached checklist.

All sources were observed with no problems noted.

Some records were not immediately available so the inspection was continued on 5/4 to give Mr. Brady time to pull the records together

Compliance Status: <input checked="" type="checkbox"/> In <input type="checkbox"/> Out <input checked="" type="checkbox"/> Pending <input type="checkbox"/> Awaiting Co. Report		Needs a Follow-Up Inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Company Representative: Matt Brady	Title: EHS Coordinator	Signature: 	Date: 5-4-16
DEP Representative: Anthony Malaboc	Title: AQS	Signature: 	Date/Time: 5/4/16

This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.

Inspection Date: ~~3/17/16~~ 4/26/16

Facility Description: This facility performs non-ferrous forging, primarily for large trucks.

Site Contact: Matt Brady, EHS Coordinator; 814-480-6400

Number of Employees: 280 . **Facility Operates** 6 **Days/Week,** 3 **Shifts Per Day.**

Asbestos Removal: Yes, Notification form submitted for removal in 2015.

Demo / New Construction: None

Enforcement actions since last FCE: None

Section B. General Site Requirements:

- #002, #003 The operating permit expires on 3/31/2019, the renewal application due 6 – 18 months prior to expiration.
- #006, #009 Allow entry and inspection, access to records, and sampling and monitoring.
- #015 May not reactivate a source that has been out of operation > 1 year without approval.
- #019, #020 Comply with sampling, monitoring, testing and record keeping requirements, maintain records for 5 years, and make records available to the Department upon request.

Section C. Site Level Requirements:

- #001 No fugitive emissions present in the outdoor atmosphere except from construction or demolition, grading, maintenance, use of roads, land clearing, stockpiles, etc.
- #015 Reasonable actions shall be taken to prevent particulate matter to become airborne.
- #002 No fugitives from sources in condition #001 should be visible outside the property.
- #003 No malodors detected outside the property.
- #004 No emissions into the outdoor atmosphere with opacity equal to or greater than 20% for a period of more than 3 min in one hour or equal to or greater than 60% at any time.
- #006 Facility-wide **Carbon Monoxide** emissions are limited to a maximum of **95 tons per year**. CO emissions for last calendar year: 32.2 tons
- #008, #009 Monitor and record the amount of **natural gas combusted** on a **monthly** basis.
- #009 Keep **on-site facility logs for monthly totals of Carbon Monoxide and Nitrogen Oxides** emissions from all processes; monthly totals shall be added to the previous 11-month totals to assure compliance.
- #012, #013 **Emissions Inventory report** to be submitted by March 1 of each year.
- #016 No open burning.

Section D. Source Level Requirements:

Source 106B; 1995 (Heat Treat 2) Quench Tank

FML-1 (natural gas) ⇒ CU-106B ⇒ STAC-S106B

- ✓ #001 No SO₂ > 4 lbs. /mmBtu of heat input in 1 hour (compliance demonstrated by using natural gas for fuel which has inherently low sulfur content).
- ✓ #002 Operate and maintain as per mfg.'s specifications.

Source 102; 8000 Ton Forging Press (Line 1)

PROC-102 (Aluminum Forgings) ⇒ CNTL-C102 (Venturi Scrubber) ⇒ STAC-S102

- N/A #001 No PM > 0.02 gr/dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).
- N/A #003, #004 #005, #007 A device shall be permanently installed to indicate **pressure drop** across the scrubbers; the **daily pressure drop** shall be recorded.

Pressure drop during inspection: N/A (minimum 12" w.g. shall be maintained)

- N/A #003, #004, #006, #007 A device shall be permanently installed to indicate the **water flow rate** to the Venturi scrubber; the **daily flow rate** shall be recorded.

Flow rate during inspection: N/A (rate of 220 gallons/min shall be maintained)

- N/A #004 Maintain a log of all preventive maintenance inspections on control devices; logs shall contain the dates, potential problems & defects and corrective measures taken.
- N/A #008, #009 The source shall not be operated without the air pollution control devices. The source and control device shall be operated as per manufactures specs and consistent with good air pollution control practices.

This source has not been run in the last 3 years and there are no current plans to use the press

Source 103; 7000 Ton Forging Press (Line 4)

PROC-103 (Aluminum Forgings) ⇒ CNTL-C103 (Venturi scrubber) ⇒ STAC-S103

- ✓ #001 No PM > 0.01 grain/dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).
- ✓ #002, #003, #004, #008 A device shall be permanently installed to indicate **pressure drop** across the scrubbers; the **daily pressure drop** shall be recorded.

Pressure drop during inspection: N/A (minimum 12" w.g. shall be maintained). 74.7" on 5/1

- ✓ #002, #003, #005, #008 A device shall be permanently installed to indicate the **water flow rate** to the Venturi scrubber; the **daily flow rate** shall be recorded.

Flow rate during inspection: N/A (rate of ^{at least} 140 gallons/min shall be maintained) 290 gal/min on 5/4

Accuride Erie

PFID: 510626

Permit: 25-00066 (SM)

Inspection Date: ~~5/13/16~~ 4/24/16

- ✓ #003 Facility shall maintain a log of all preventive maintenance inspections on control devices; shall contain the dates, potential problems & defects, corrective measures taken as well as the pressure drop and water flow rate.
- ✓ #006, #007 The sources shall not be operated without the air pollution control devices and shall be operated as per mfg.'s specs and consistent w/good air pollution control practices.

*This source was not running during the inspection, it is only run approx. 1/week
 A copy of the maintenance records for the control device is included as Attachment A
 The source was observed running on 5/14, some VE observed from stack but appeared to be within opacity limits.*

Source 104; 2000 (Heat Treat 3) Heat Treating Furnaces

FML-1 ⇒ PROC-104 (Aluminum wheels) ⇒ STAC-S104

- ✓ #001 Emission Restrictions (and reported emissions for the last calendar year):

CO (5.60 tpy) <u>0.67</u>	SOx (0.04 tpy) <u>0.005</u>	TOC (0.569 tpy) <u>0.044</u>
PM10 (1.23 tpy) <u>0.061</u>	NOx (7.75 tpy) <u>0.8</u>	
- ✓ #002, #003 Only be fired with natural gas; records of natural gas usage maintained for 5 years.

Source 106A; 1995 (Heat Treat 2) Solution Furnace

FML-1 (Natural gas) ⇒ PROC-106A ⇒ STAC-S106A

- ✓ #001 No PM in effluent gas > 0.04 grain/dscf when effluent gas volume is < 150,000 dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).
- ✓ #002 No SO₂ in effluent gas > 500 ppm by volume, dry (compliance demonstrated by using natural gas for fuel which has inherently low sulfur content).
- ✓ #003 Operate and maintain as per mfg.'s specifications.

Source 106C; 1995 (Heat Treat 2) Age Furnace

FML-1 (Natural gas) ⇒ PROC-106C ⇒ STAC-S106C

- ✓ #001 No PM in effluent gas > 0.04 grain/dscf when effluent gas volume is < 150,000 dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).
- ✓ #002 No SO₂ in effluent gas > 500 ppm by volume, dry (compliance demonstrated by using natural gas for fuel which has inherently low sulfur content).
- ✓ #003 Operate and maintain as per mfg.'s specifications.

Source 107; (2) Cold Cleaning Machines (4-4, 22-7)

PROC-107 ⇒ STAC- Z107

- ✓ #001 Cold Cleaning Machines (2 or more gals solvent w/greater than 5% VOCs):
 - a. Immersion machines shall have a freeboard ratio of 0.50 or greater.
 - b. Have a permanent, conspicuous label summarizing operating requirements.
 - c. Fans should not be blowing across the work area.
 - d. The machine should be covered at all times when not in use OR for remote reservoir cold cleaning machines, a perforated drain with a max. 6" dia.
 - e. Waste solvent shall be collected & stored in closed containers.
 - f. Absorbent materials may not be cleaned in the cold cleaning machine
 - g. Do not use any solvent with a vapor pressure of 1.0 mm Hg or greater and containing greater than 5% VOC by weight.
 - h. For any solvent containing VOC's, the following information must be provided:
Name and address of supplier, type of solvent including product or vendor ID#, & the vapor pressure of the solvent measured in mmHg at 20 C.
 - i. MSDS or other appropriate documentation provided

The two machines on site are used infrequently. They need to ensure that there is a permanent label of operating requirements with the machines.

Source 108; Process Heating – Natural Gas Usage

FML-1 (Natural Gas) ⇒ PROC-108 ⇒ STAC-S108 / STAC-Z108

Includes 12 different pieces of equipment used for the production process:

Annealing furnace (4-1), Stress relief furnace (4-2), Lg. Die Heater (22-20), Sm. Die Heater (22-21), 5000/8000 Venturi Duct Wash Heater (12-1), Pre-heat furnaces (22-1, 22-2, 22-5), Press Die Ring Burner (22-10) Press Die Torches (22-11, 22-19), Press Die Ring Burner (22-18)

Note: The following natural gas-fired units have stack emissions subject to restrictions:

Pre-heat Furnace #1 & #2 (22-1 & 22-2) subject to PM & SOx emission restrictions.
5000/8000 Venturi Scrubber Duct Wash Heater (12-1) is subject to SOx emission restrictions.

- ✓ #001 No PM > 0.04 grain/dscf when effluent gas volume is < 150,000 dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).
- ✓ #002, #003 No SO₂ in effluent gas > 500 ppm by volume dry or at a rate > 4 lbs/mmBtu over a 1 hour period (compliance demonstrated by using natural gas for fuel which has inherently low sulfur content).
- ✓ #004 Operate and maintain as per mfg.'s specifications.

Inspection Date: ~~4/24/16~~ 4/24/16

Source 109; Miscellaneous Natural Gas Usage

FML-1 (Natural Gas) ⇒ PROC-109 ⇒ STAC-S109 / STAC-Z109

Includes natural gas-fired equipment not used for the production process (space heating units, infrared heaters, air-makeup heaters, emergency generators, & hot water heaters); all less than 10 MMBtu/hr.

- #001 No PM in effluent gas > 0.04 grain/dscf when effluent gas volume is < 150,000 dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).
- #002, #003 No SO₂ in effluent gas > 500 ppm by volume dry or at a rate > 4 lbs/mmBtu over a 1 hour period (compliance demonstrated by using natural gas for fuel which has inherently low sulfur content).
- #004 Operate and maintain as per mfg.'s specifications.

Source 110; (9) Wheel Washers (5-6, 5-7, 5-10, 285, 585, 785, 885, 985, ML)

FML-1 (Natural Gas) ⇒ PROC-110 ⇒ STAC-S110

- #001 No PM > 0.04 grain/dscf when effluent gas volume is < 150,000 dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).
- #002 No SO₂ in effluent gas > 500 ppm by volume dry (compliance demonstrated by using natural gas for fuel which has inherently low sulfur content).
- #003 Operate and maintain as per mfg.'s specifications

Source 111; (2) Carbottom Furnaces

PROC-111 (Aluminum Dies) ⇒ STAC-S111

- #001 No PM > 0.04 grain/dscf when effluent gas volume is < 150,000 dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).
- #002 Operate and maintain as per mfg.'s specifications.

One furnace in use during the inspection

Source 112 A, 112 B, 112C; 2006 Heat Treat Line

FML-1 (Natural gas) ⇒ PROC-112A (solution furnace) ⇒ STAC-S112A / STAC-S112B

FML-1 (Natural gas) ⇒ PROC-112B (quench tank) ⇒ STAC-S112C

FML-1 (Natural gas) ⇒ PROC 112C (age furnace) ⇒ STAC-S112D / STAC-S112E

✓ #001, #004, #009 Emission Restrictions for the 2006 Heat Treat Line; records shall be kept and calculated on a monthly basis, 12-month rolling total also to be calculated.

Most recent rolling totals: *Nov 3/16*

CO (9.07 tpy) 112A 0.75 112B 0.07 112C 0.45

SOx (0.04 tpy) 112A 0.005 112B 0.001 112C 0.003

VOC (0.40 tpy) 112A 0.049 112B 0.005 112C 0.029

PM10 (0.57 tpy) 112A 0.068 112B 0.007 112C 0.041

NOx (6.00 tpy) 112A 0.89 112B 0.09 112C 0.53

NOx and CO emissions shall be calculated based on the following:

Vendors emission factors x fuel usage x hours of operation

PM10, SOx, and VOC emissions shall be calculated based on the following:

Most recent AP-42 factor x fuel usage x hours of operation

✓ #002, #004, #005, #007 Only use natural gas for fuel for each source; shall install gas meters to measure natural gas amounts; **monthly** records of usage shall be kept and totaled based on 12-mo rolling total.

✓ #004, #005 Monitor the temperature of each source on a **continuous** basis during all hours the source is utilized; records of the temperature shall be kept

✓ #004, #006 Conduct **annual inspection and tune-up** of each of the burners; records shall be kept of the inspection, tune-ups and any adjustments.

✓ #008 Operate and maintain as per mfg.'s specifications.

Copies of the annual inspection report was obtained and included as attachment B

Source 113; 7000 Ton Forge Line 5

FML-1 ⇒ PROC-113 ⇒ CNTL-C113 (Line 5 wet scrubber) ⇒ STAC-S113

✓ #001 PM not to exceed .02 grain/dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).

✓ #002, #003, #004 Monitor and record the pressure drop **daily**.

Pressure drop during inspection: 37.5 (maintained between 30 – 45 inches w.g.).

see comments #002, #003, #004 Monitor and record the flow rate **daily**.

Flow rate during inspection: 185 (maintained between 200 - 310 gallons/min).

✓ #003, 004 Maintain a copy of the mfg.'s spec's; source and control device to be operated and maintained as per mfg.'s specs.

✓ #003 Records shall be kept for any maintenance performed on the source and control device; records are to include date, time, and duration of any malfunction and are to be kept 5 years.

Inspection Date: ~~4/28/16~~ 4/28/16

✓ #004 The scrubber shall be operated whenever the forging press is operated.

✓ #005 The die preheat furnace shall only combust pipeline quality natural gas.

Flow rate through the scrubber was low due to maintenance work being performed.
Scrubber monitoring records for Forge 4, 5, 6 were obtained and included as Attachment D

Source 114; 7000 Ton Forge Line 6

FML-1 ⇒ PROC-114 ⇒ CNTL-C114 (Line 6 wet scrubber) ⇒ STAC-S114

✓ #001 PM is limited and shall not exceed .02 gr/dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).

✓ #002, #003, #004 Monitor and record the pressure drop **daily**.

Pressure drop during inspection: 38.1 (maintained between 30 – 45 inches w.g.).

✓ #002, #003, #004 Monitor and record the flow rate **daily**.

Flow rate during inspection: 215 (maintained between 200 - 310 gallons/min).

✓ #003, #004 Maintain a copy of the mfg.'s spec's; source and control device to be operated and maintained as per mfg.'s specs.

✓ #003 Records shall be kept for any maintenance performed on the source and control device; records are to include date, time, and duration of any malfunction and are to be kept 5 years.

✓ #004 The scrubber shall be operated whenever the forging press is operated.

✓ #005 The die preheat furnace shall only combust pipeline quality natural gas.

Source 115; Wheel Machining Lines 2, 8, 9

PROC-115 ⇒ CNTL-C115A (Smog Hog (2) for line 2) ⇒ STAC-S115A

↳ CNTL-C115B (Smog Hog (2) for line 8) ⇒ STAC-S115B

↳ CNTL-C115C (Smog Hog for line 9) ⇒ STAC-S115C

✓ #001 No PM > 0.04 grain/dscf when effluent gas volume is < 150,000 dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).

✓ #002, #003 Weekly preventative maintenance inspections of the smog-hog shall be conducted; a log of all preventive maintenance inspections shall be maintained and include dates, problems & defects and corrective measures taken.

See
Comments ✓ #003 Daily monitoring of the smog hog indicator light shall be conducted to ensure proper operation.

✓ #003 The sources shall not be operated without the smog hog and both shall be operated as per mfg.'s specs.

There is no indicator light for this equipment. A pressure gauge is used instead.

Source 116; Polishing Cells (5)

PROC-116 ⇒ **CNTL-C116A** (Venturi scrubber for cells 1-4) ⇒ **STAC-S116A**

↳ **CNTL-C116B** (Venturi scrubber for cells 5) ⇒ **STAC-S116B**

- ✓ #001 No PM > 0.04 grain/dscf when effluent gas volume is < 150,000 dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).
 - ✓ #002, #004 Monitor and record the pressure drop across the control device
 Pressure drop during inspection: C116A: 1.2 C116B: 9
 - ✓ #004 Monitor the flow rate of the gas and liquid in the Venturi scrubber.
 Flow rate during inspection: C116A: 1.5 C116B: ^{see} Comments
 - ✓ #002 #004 Weekly preventative maintenance inspections of the control device shall be conducted; a log of all preventive maintenance inspections shall be maintained and include dates, problems & defects and corrective measures taken.
 - ✓ #003, #004 The sources shall not be operated without the Venturi scrubber and both shall be operated as per mfg.'s specs and using good air pollution control practices.
- For C116B a float is used to monitor and replenish water in the tank. Maintenance is done by Genesis Process solutions, a copy of the maintenance record is included as Attachment C

Source 117; Emergency Generator 150 HP

FML-1 (Natural Gas) ⇒ **PROC-117** ⇒ **STAC-S117**

- ✓ #001 No PM > 0.04 grain/dscf when effluent gas volume is < 150,000 dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).
 - ✓ #002 Meet the following emission limits: NOx – 2.75 tons during ozone season and 6.6 tpy annually on a 12 month rolling basis, (Compliance is demonstrated by properly operating and maintaining the generator).
 - ✓ #003, #005, #007 Records of NOx emissions and generator run time (with a non-resettable hour meter) shall be maintained on a 12 month rolling total. NOx emissions records shall be kept for 5 years
 - ^{See} Comments #004 Preventative maintenance records maintained and include dates of inspections, problems & defects and corrective measures taken.
 - ✓ #006 The sources shall be operated as per mfg.'s specs and using good air pollution control practices.
 - ✓ #009 The emergency stationary ICE may operate no more than 100 hours per year for non-emergency situations (maintenance/readiness checks)
- Serial #: 2248512 Preventative maintenance records are kept with the contractor. Copies should be kept on site.

Source 118; Emergency Fire Water Pump, 4Cy, Diesel New Source, Conditions need updated

FML-2 ⇒ PROC-118 ⇒ STAC-S118

- ✓ #001 No PM > 0.04 grain/dscf when effluent gas volume is < 150,000 dscf (if no visible emissions are present, it is believed the facility is in compliance with this condition).
- ✓ #002 Meet the following emission limits: NO_x – 2.75 tons during ozone season and 6.6 tpy annually on a 12 month rolling basis, (Compliance is demonstrated by properly operating and maintaining the generator).
- ✓ #003, #004 The generator shall be equipped with a non-resettable hour meter and generator usage shall be recorded.
- ✓ #004, #005 Records of NO_x emissions shall be maintained on a 12 month rolling total and NO_x emissions records shall be kept for 5 years.
- ✓ #006, #009, #011 The sources shall be installed and operated as per mfg.'s specs, emissions-related written instructions and using good air pollution control practices.
- ✓ #008 Meet the following emission limits: NMHC +NO_x - 3.0g/hp-hr, PM – 0.3g/hp-hr (Compliance is demonstrated by properly operating and maintaining the generator).
- ✓ #011 Maintain a maintenance plan and records of conducted maintenance.

Serial #: 73160026 There is a question as to if a performance test is required for this engine. I will discuss this with my supervisor and follow-up with the company. No performance test has been done.

Section G. Miscellaneous:**Activities/sources with no emission limitations or add'l requirements:**

Die shop weld booth, aluminum billet saw, band saw, (3) wheel machining lines (consists of a CNC machine, a prestress machine, a handhole machine with smoghog exhausting indoors), (5) wheel spinners, building 22 fugitive emissions (22-12), (3) trim presses, wheel cooler, inter-source chip processor, Hoffman sandblasting unit, quality dept lathe, ventilation fans, plant maintenance, battery chargers, waste oil/coolant tank, steam cleaning units, mega line wheel machining sources, rosler polishing cell and miscellaneous machining equipment (consists of planers, lathes, metal saws, grinders, & drill presses).

RFD (10/15/2015): Modify nine mist collectors to exhaust outdoors instead of indoors.

RFD (4/9/2014): Construction of a 7,000 gallon Poly tank for bulk storage for machine line coolant.

Regarding the performance test for Source 118, after getting clarification of the regulation, it was determined that the performance test is only required if the engine is not installed per manufacturer's specifications (copy of the regulation included as Attachment 6). Since the source was installed per manufacturer's specifications, no performance test is required. ASN 5/10/16



ESTABLISHED IN 1983



Calibration Certification Record

Company:	Accuride
Location:	Erie, PA
Equipment Location:	Forge 4
Tag Number:	FG-4 Demister
Service:	FG-4 Demister Pressure
Manufacturer:	Foxboro
Model Number:	IDP10
Serial Number:	N/A
Date Calibrated:	1/27/2016
Next Calibration due:	7/2016

Test Equipment Used

Make/Model:	Serial #:	Cert #:	Cal Date:	Due Date:
Fluke 179	21830343	WOZ-150	12/1/15	12/1/16
Crystal XP2I	760480	87634	3/31/15	3/31/16

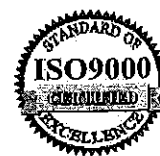
Test Results

Range (%)	Input " H ₂ O	Output (ma)		
		Expected	As Found	As Left
0	0.0	4.00	3.99	3.99
50	5.0	12.00	12.09	12.00
100	10.0	20.00	20.01	20.01

Remarks: Tolerance +/- 1%

Calibration Completed by Process Control Services

PCS Representative:	Ed Banks	Report Date:	1/27/2016
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Calibration Certification Record

Company:	Accuride
Location:	Erie, PA
Equipment Location:	Forge 4
Tag Number:	FG-4 Venturi
Service:	FG-4 Venturi Pressure
Manufacturer:	Foxboro
Model Number:	IDP10
Serial Number:	N/A
Date Calibrated:	1/27/2016
Next Calibration due:	7/2016

Test Equipment Used

Make/Model:	Serial #:	Cert #:	Cal Date:	Due Date:
Fluke 179	21830343	WOZ-150	12/1/15	12/1/16
Crystal XP2I	760480	87634	3/31/15	3/31/16

Test Results

Range (%)	Input		Output (ma)	
	" H ₂ O	Expected	As Found	As Left
0	0.0	4.00	4.02	4.02
50	50.00	12.00	12.00	12.00
100	100.00	20.00	20.00	20.00

Remarks: Tolerance +/- 1%

Calibration Completed by Process Control Services:

PCS Representative:	Ed Banks	Report Date:	1/27/2016
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Calibration Certification Record

Company:	Accuride
Location:	Erie, PA
Equipment Location:	Forge 4
Tag Number:	FG-4 Vacuum
Service:	FG-4 Vacuum Pressure
Manufacturer:	Foxboro
Model Number:	IDP10
Serial Number:	N/A
Date Calibrated:	1/27/2016
Next Calibration due:	7/2016

Test Equipment Used

Make/Model:	Serial #:	Cert #:	Cal Date:	Due Date:
Fluke 179	21830343	WOZ-150	12/1/15	12/1/16
Crystal XP21	760480	87634	3/31/15	3/31/16

Test Results

Range (%)	Input	Output (ma)		
		Expected	As Found	As Left
0	0.0	4.00	3.99	3.99
50	5.0	12.00	12.01	12.01
100	10.0	20.00	20.03	20.03

Remarks: Tolerance +/- 1%

Calibration Completed by Process Control Services

PCS Representative:	Ed Banks	Report Date:	1/27/2016
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Calibration Certification Record

Company:	Accuride
Location:	Erie, PA
Equipment Location:	Forge 4
Tag Number:	FG-4 Recirc
Service:	FG-4 Recirc Flow
Manufacturer:	Foxboro
Model Number:	IMT25-PDADD10N-A
Serial Number:	97471013
Date Calibrated:	1/27/2016
Next Calibration due:	7/2016

Test Equipment Used

Make/Model:	Serial #:	Cert #:	Cal Date:	Due Date:
Foxboro IMTSIM-11	02450637	87927	5/4/15	5/4/16

Test Results

Range (%)	Input		Output (ma)	
	Cal Simulator	Expected	As Found	As Left
0	25.57	25.57	25.60	25.60
25	51.14	51.14	51.14	51.14
50	102.28	102.28	102.10	102.10
75	204.58	204.58	204.48	204.48
100	409.16	409.16	408.99	408.99

Remarks: Tolerance +/- 1%

Calibration Completed by Process Control Services:

PCS Representative:	Ed Banks	Report Date:	1/27/15
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Calibration Certification Record

Company:	Accuride
Location:	Erie, PA
Equipment Location:	Forge 4
Tag Number:	FG-4 WW
Service:	FG-4 WW Flow
Manufacturer:	Foxboro
Model Number:	IMT25-PDADD10N-A
Serial Number:	97471014
Date Calibrated:	1/27/2016
Next Calibration due:	7/2016

Test Equipment Used

Make/Model:	Serial #:	Cert #:	Cal Date:	Due Date:
Foxboro IMTSIM-11	02450637	87927	5/4/15	5/4/16

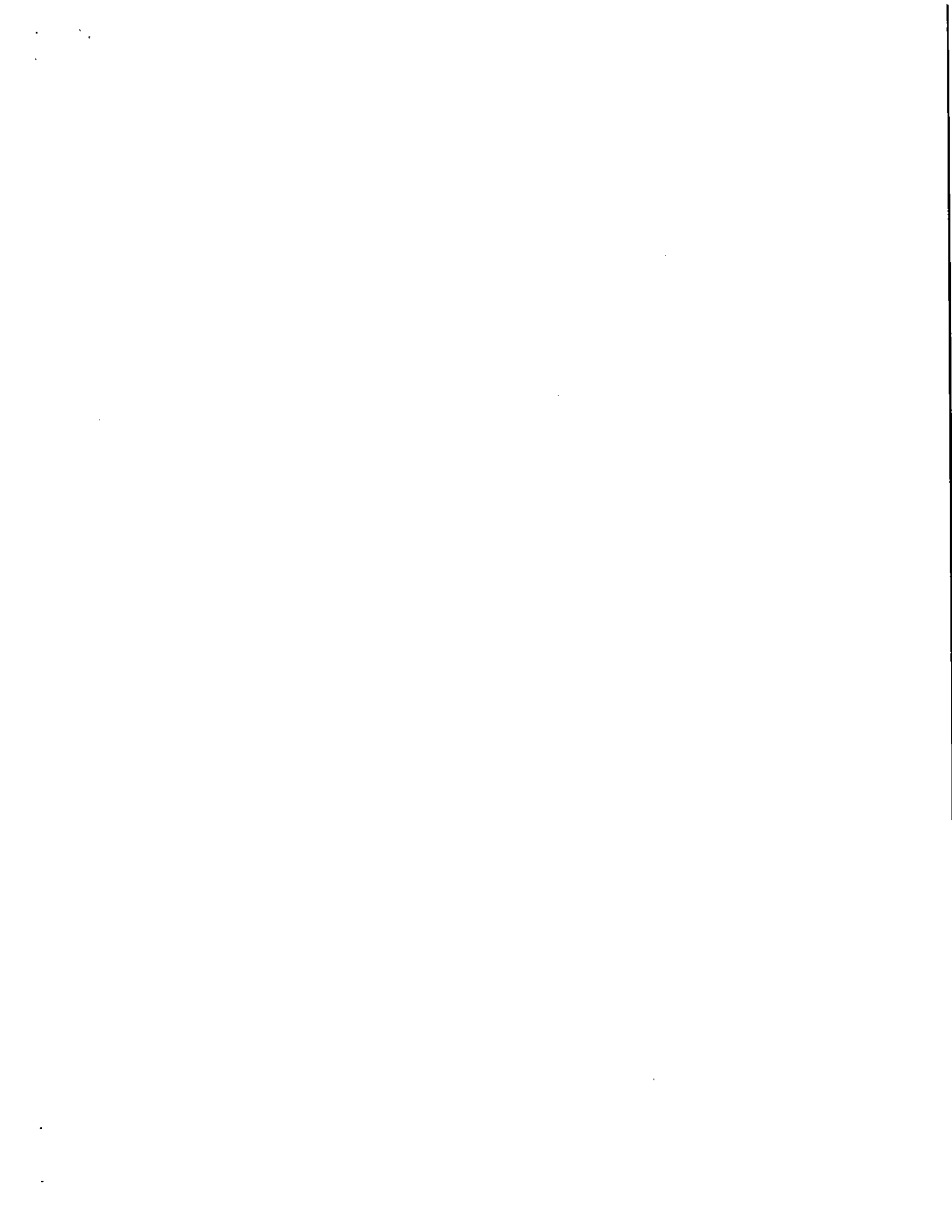
Test Results

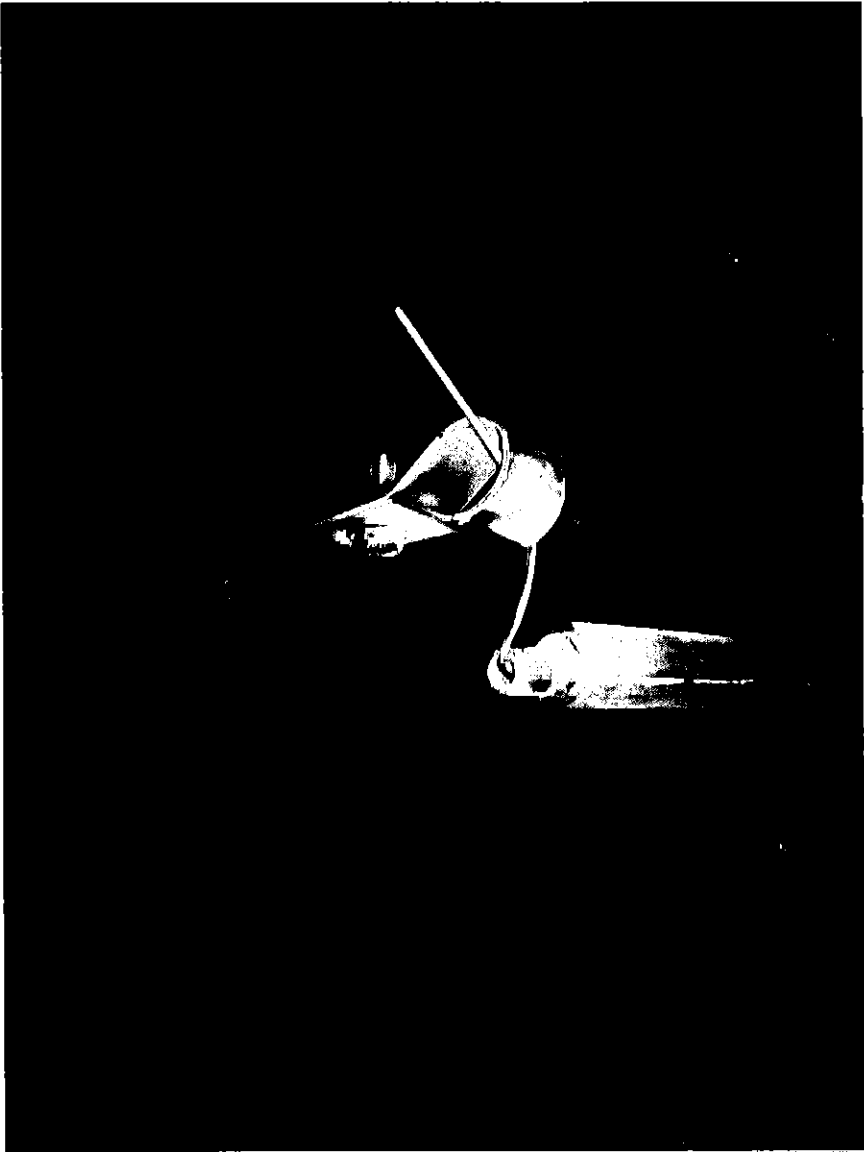
Range (%)	Output (ma)			
	Cal Simulator	Expected	As Found	As Left
0	1.36	1.36	1.25	1.25
25	2.45	2.45	2.50	2.50
50	4.58	4.58	4.68	4.68
75	9.98	9.98	9.95	9.95
100	20.20	20.20	19.99	19.99

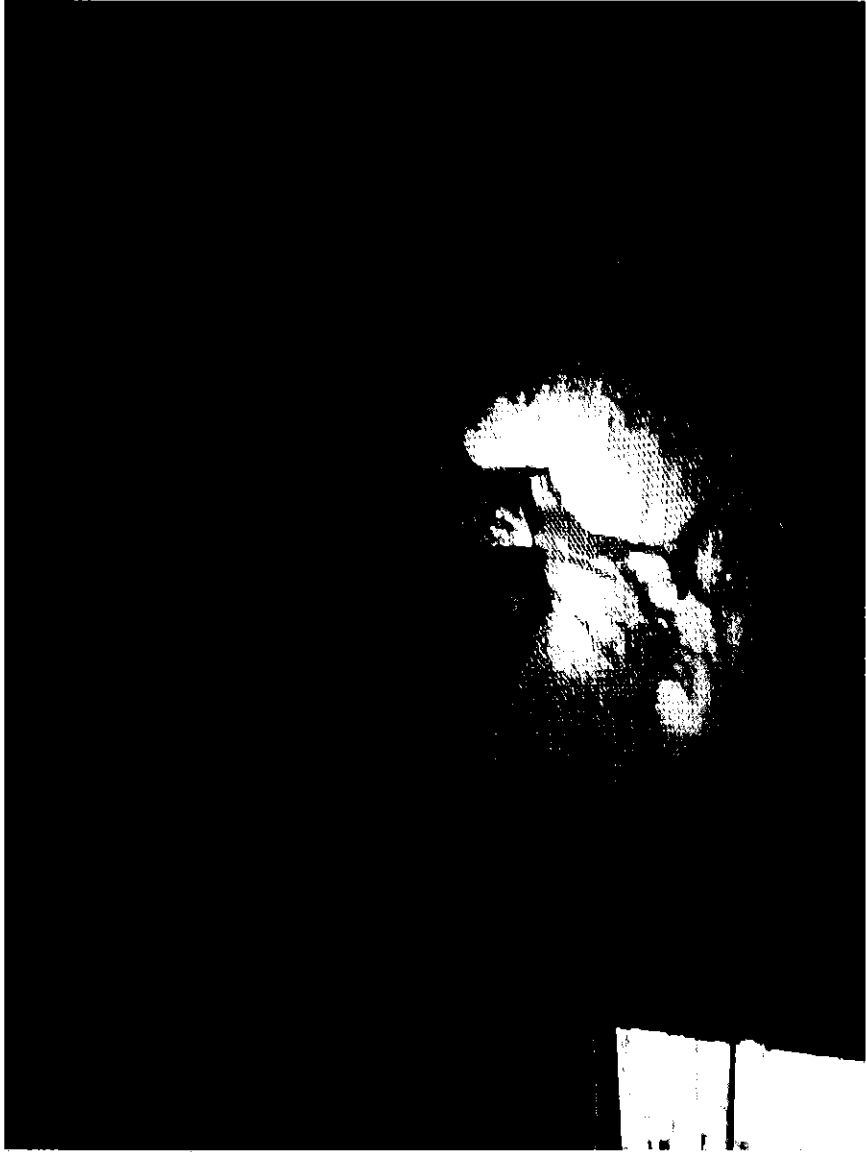
Remarks: Tolerance +/- 1%

Calibration Completed by Process Control Services

PCS Representative:	Ed Banks	Report Date:	1/27/2016
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11-18-2015

Tim Arens

ACCURIDE 2006 HT 4 SOLUTION FURNACE AND AGE OVENS
INSPECTION REPORT

During the week of 11-18-2015 I completed inspection of heat treat system,

Serial number- 173349 2006 solution furnace and age oven

2006 Furnace inspection findings

- HEATER BOXES
- Zone one needs to be cleaned of all loose debris
- Clean recirculation fan of accumulated debris
- Needs some minor mesh repair over insulation
- Zone two recirculation fan fins look to be a little warped or stressed. This is the one with vibration, Accuride is having it rebalanced Thursday.
- Also needs accumulated debris in fan wheel cleaned
- Spinning the fan by hand seems to be smooth
- In the chamber, the side air panels 3,4,5,7,7,8 on the north side stating from the exit end all need to be replaced or fixed
- Pressure side air flow pipe needs a quarter turn counter clock wise to have the proper orientation (zone two heater box recirculation fan)
- T/C brackets should be removed. They interfere with the T/C's
- Side air curtain panels are damaged on the south side 3rd and 4th panels in from the entrance end system

Age oven inspection findings

- ONEX has completed installing new insulation on all ends of ovens door openings. And now working on heater boxes almost complete
- The zone one heater box one cleaned of all debris, everything else looked good
- Zone two heater box needs insulation repair just right of door opening
- Need to clean all loose debris out
- Zone three heater box needs insulation repair just right of door opening. One large 18" hole down to metal and a smaller spot just below that one
- Then clean all loose debris out
- AGE OVEN CHAMBER
- All the thermal couple brackets were removed, they were interfering with the T/C's
- Midway through oven found a rim stacking ring below the rollers was removed
- Going from the exit end north side. Side panels 1,2 ,5,6 need to be repaired
- Need to rewire or secure #8 side curtain panel pin
- T/C next to that pin is missing?
- #6 T/C on the north side from exit end is cracked should be replaced
- There is a broken key on one roller located just past the 6th T/C from the exit end south side
- Need to fix side air curtain panels 2,3,4,5,6,7,8 going from the south side entrance end
- Need to double nut panel retaining pin 6th joint from the entrance end north side

Accuride Erie
 1015 East 12th
 Erie, PA 42420
 Tel 814.480.6400
 Fax 814.452.0809



Purchase Orders

Attachment C

PO	Building	Rev	PO Date	Due Date	Supplier	Type	Status	Issued By	Blanket Items	Note
EP16-005915	Erie		4/7/16	4/15/16	Genesis Process Solutions	Indirect Service	Completed	Jordano, Sheri	No	POLISHING SCRUBBER CLEANING FOR MARCH 2016
EP16-005914	Erie		4/7/16	4/26/16	ECS&R	Indirect Service	Review	Jordano, Sheri	No	FG4 Scrubber and Ductwork Cleaning - April 2016
EP16-005913	Erie		4/13/16	4/17/16	ECS&R	Indirect Service	Completed	Jordano, Sheri	No	FG6 Scrubber Cleaning - April 2016
EP16-005912	Erie		4/11/16	4/15/16	ECS&R	Indirect Service	On Order	Jordano, Sheri	No	FG5 Scrubber Cleaning - April 2016
EP16-005531	Erie		3/9/16	3/18/16	Genesis Process Solutions	Indirect Service	Completed	Jordano, Sheri	No	POLISHING SCRUBBER CLEANING FOR MARCH 2016
EP16-005384	Erie		2/17/16	2/20/16	ECS&R	Indirect Service	Completed	Jordano, Sheri	No	PUMP OUT OF POLISHING SCRUBBER TANK TO ALLOW REPAIRS TO DRAG CONVEYOR
EP16-005232	Erie		2/17/16	2/29/16	ECS&R	Indirect Service	On Order	Jordano, Sheri	No	FG4 Scrubber and Ductwork Cleaning - February 2016
EP16-005231	Erie		2/17/16	2/29/16	ECS&R	Indirect Service	Completed	Jordano, Sheri	No	FG5 Scrubber Cleaning - FEBRUARY 2016
EP16-005230	Erie		2/18/16	2/29/16	ECS&R	Indirect Service	Completed	Jordano, Sheri	No	FG6 Scrubber Cleaning - February 2016
EP16-005229	Erie		2/15/16	2/29/16	Genesis Process Solutions	Indirect Service	Completed	Jordano, Sheri	No	Polishing Scrubber and Dust Collector Cleaning (February 12th)
EP16-005047	Erie		1/28/16	1/29/16	ECS&R	Indirect Service	On Order	Jordano, Sheri	No	FG4 Scrubber and Ductwork Cleaning - January 2016
EP16-005046	Erie		1/21/16	2/12/16	Process Control Services	Indirect Service	Completed	Jordano, Sheri	No	Process Control Services Will Provide A Trained Field Service Technician For Up To Two (2) Days Of Semi-Annual Calibration Services For Your Three Scrubbers At Your Erie, PA Facility
EP15-004740	Erie		12/17/15	1/8/16	Genesis Process Solutions	Indirect Service	Completed	Jordano, Sheri	No	Polishing Scrubber and Dust Collector Cleaning (January 8th)
EP15-004739	Erie		12/17/15	1/16/16	ECS&R	Indirect Service	Completed	Jordano, Sheri	No	FG5 Scrubber Cleaning - January 2016
EP15-004738	Erie		12/31/15	1/15/16	ECS&R	Indirect Service	Completed	Jordano, Sheri	No	FG6 Scrubber Cleaning - January 2016 - prep for Schuler Outage
EP15-004456	Erie		11/18/15	12/6/15	ECS&R	Indirect Service	Completed	Jordano, Sheri	No	FG6 Scrubber Cleaning - December 2015
EP15-004455	Erie		11/18/15	11/24/15	ECS&R	Indirect Service	Completed	Jordano, Sheri	No	FG4 Scrubber and Ductwork Cleaning - November 2015
EP15-004454	Erie		11/18/15	11/29/15	ECS&R	Indirect Service	Completed	Jordano, Sheri	No	FG5 Scrubber Cleaning - NOVEMBER 2015
EP15-004453	Erie		11/24/15	12/4/15	Genesis Process Solutions	Indirect Service	Completed	Jordano, Sheri	No	Polishing Scrubber and Dust Collector Cleaning (DEC 4th)
EP15-004192	Erie		10/21/15	10/25/15	ECS&R	Indirect Service	Completed	Jordano, Sheri	No	FG5 Scrubber Cleaning - OCTOBER 2015
EP15-004190	Erie		10/23/15	11/1/15	ECS&R	Indirect Service	Completed	Jordano, Sheri	No	FG6 Scrubber Cleaning - October 2015 (nov1)
EP15-004189	Erie		10/21/15	10/30/15	Genesis Process Solutions	Indirect Service	Completed	Jordano, Sheri	No	Polishing Scrubber and Dust Collector Cleaning (October)
EP15-003943	Erie		10/2/15	10/3/15	Genesis Process Solutions	Indirect Service	Completed	Jordano, Sheri	No	

ELECTRONIC CODE OF FEDERAL REGULATIONS**e-CFR data is current as of May 3, 2016**

Title 40 → Chapter I → Subchapter C → Part 60 → Subpart IIII → §60.4211

Title 40: Protection of Environment

PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

§60.4211 What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?

(a) If you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under paragraph (g) of this section:

(1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;

(2) Change only those emission-related settings that are permitted by the manufacturer; and

(3) Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.

(b) If you are an owner or operator of a pre-2007 model year stationary CI internal combustion engine and must comply with the emission standards specified in §§60.4204(a) or 60.4205(a), or if you are an owner or operator of a CI fire pump engine that is manufactured prior to the model years in table 3 to this subpart and must comply with the emission standards specified in §60.4205(c), you must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) through (5) of this section.

(1) Purchasing an engine certified according to 40 CFR part 89 or 40 CFR part 94, as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications.

(2) Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in this subpart and these methods must have been followed correctly.

(3) Keeping records of engine manufacturer data indicating compliance with the standards.

(4) Keeping records of control device vendor data indicating compliance with the standards.

(5) Conducting an initial performance test to demonstrate compliance with the emission standards according to the requirements specified in §60.4212, as applicable.

(c) If you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in §60.4204(b) or §60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to this subpart and must comply with the emission standards specified in §60.4205(c), you must comply by purchasing an engine certified to the emission standards in §60.4204(b), or §60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in paragraph (g) of this section.

(d) If you are an owner or operator and must comply with the emission standards specified in §60.4204(c) or §60.4205(d), you must demonstrate compliance according to the requirements specified in paragraphs (d)(1) through (3) of this section.

(1) Conducting an initial performance test to demonstrate initial compliance with the emission standards as specified in §60.4213.

(2) Establishing operating parameters to be monitored continuously to ensure the stationary internal combustion engine continues to meet the emission standards. The owner or operator must petition the Administrator for approval of operating parameters to be monitored continuously. The petition must include the information described in paragraphs (d)(2)(i) through (v) of this section.

(i) Identification of the specific parameters you propose to monitor continuously;

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

(ii) [Reserved]

(g) If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

(1) If you are an owner or operator of a stationary CI internal combustion engine with maximum engine power less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if you do not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or you change the emission-related settings in a way that is not permitted by the manufacturer, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action.

(2) If you are an owner or operator of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

(3) If you are an owner or operator of a stationary CI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. You must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.

[71 FR 39172, July 11, 2006, as amended at 76 FR 37970, June 28, 2011; 78 FR 6695, Jan. 30, 2013]

Need assistance?