

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

B191458394

FACILITY: Chemours		SRN / ID: B1914
LOCATION: 6270 WILKES RD, MONTAGUE		DISTRICT: Grand Rapids
CITY: MONTAGUE		COUNTY: MUSKEGON
CONTACT: Bracken Netcott ,		ACTIVITY DATE: 04/30/2021
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site air quality compliance evaluation		
RESOLVED COMPLAINTS:		

Introduction

On Friday, April 30, 2021, Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) staff member Scott Evans (SE) conducted an unannounced on-site air quality inspection of the Chemours facility located at 6270 Wilkes Rd. in Montague, Michigan, to assess compliance with Permit to Install (PTI) no. 190-07 and all other applicable air quality regulations. During the inspection, proper safety precautions were taken to mitigate risks from the ongoing COVID-19 pandemic such as proper personal protective equipment (PPE) and practicing social distancing.

The facility is mostly an empty lot with a single air stripper installed as part of a ground water remediation system with four extraction wells. Historically, the site was the location of a DuPont facility that has since been shut down and demolished. Residual contaminants were located at the facility location, requiring this remediation system.

Evaluation

The facility has one active permit: PTI No. 190-07.

When approaching the facility SE observed no odors or visible emissions at the lot. Upon arrival, a note was found on the door of an old building that was once part of the original facility containing contact info for Bracken Nettcot (BN), the current contact person for the facility. SE reached out to BN and discussed the need to conduct an inspection. BN was unavailable at the moment but expressed that access to the air stripper was available and that SE could begin the inspection until BN was available. SE entered the facility and began the inspection.

PTI No. 190-07

The permit encompasses one emission unit (EUAIRSTRIPPER) and no flexible groups. EUAIRSTRIPPER includes one air stripping tower with a 4000 CFM air blower and two 10000-lb. activated carbon beds. The permit limits emissions of Volatile Organic Compounds (VOCs) to 0.1 (pounds per hour) pph

There are two process/operational limits in the PTI:

- EUAIRSTRIPPER may only operate while the carbon system is installed and operating properly.
- The two (2) carbon beds shall regenerate on a staggered 96-hour cycle.

During the inspection, the carbon bed system was operational while the system was running. The system information panel showed that, at the time of the inspection, Carbon Bed 1 was in the regeneration process while Carbon Bed 2 was in use.

The permit describes the following two monitoring requirements:

- Influent and effluent water flow rates for EUAIRSTRIPPER must be monitored on a monthly basis.
- The influent VOC and non-VOC organic compound concentrations for EUAIRSTRIPPER must also be monitored at least semi-annually.

Discussions with BN and the submitted records (discussed below) demonstrate that these monitoring requirements are being met.

The facility is required to maintain records that demonstrate the above-described monitoring requirements. It is required by the PTI that these records be maintained using the document included with it labeled "Appendix A," or in a similar approved manner. Additionally, the PTI requires that records of carbon bed cycles be maintained to demonstrate proper operation.

During the inspection, SE was able to see the computer system that monitors and records carbon bed cycling and confirm that it operates as required by the PTI. After the conclusion of the physical inspection, BN provided SE with the documentation required to demonstrate compliance with monitoring requirements. These records were not submitted with the described "Appendix A" format. However, the provided documentation supplied all necessary information as well as detailed calculations demonstrating how emission values were calculated. This is acceptable.

The following analyses was determined from the provided records for the period of April 2020 – April 2021. These records demonstrated that the facility monitors and records data monthly, which is compliant with the semi-annual monitoring requirement:

- Influent and Effluent water flow rates for EUAIRSTRIPPER remained consistent throughout this time period with average water flow rates ranging from 1.03 and 1.1 million gallons per day.
- During the time period, the highest reported influent water concentration for EUSTRIPPER for VOC and non-VOC organic compounds, as determined by laboratory analysis, reached 0.003 pph.

As demonstrated above, necessary records were maintained, and the limits were met. Though the VOC air emissions are not directly recorded by the system through air sampling, the inlet water VOC concentration and flow rate is being monitored allowing the facility to use mass balance calculations to determine air emissions, which are being maintained. These mass balance calculations being well below the 0.1 pph demonstrates compliance with the permit emission limit requirement.

The permit has one stack; SVCARBON. During the inspection, SE did not measure the stack directly, but visual inspection indicated that the stack had not been altered and appeared to meet the required dimensions of 14 inches in diameter and 95 feet above ground level.

Conclusion

At the conclusion of the inspection, the facility appeared to be compliant with PTI No. 190-07 and all other applicable air quality regulations.

NAME Scott Evans

DATE 6/11/2021

SUPERVISOR PHH