

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

P102660692

<b>FACILITY:</b> SK Saran Americas LLC		<b>SRN / ID:</b> P1026
<b>LOCATION:</b> 3400 South Saginaw Rd, MIDLAND		<b>DISTRICT:</b> Bay City
<b>CITY:</b> MIDLAND		<b>COUNTY:</b> MIDLAND
<b>CONTACT:</b> Brad Blanchard , EH&S Specialist		<b>ACTIVITY DATE:</b> 11/02/2021
<b>STAFF:</b> Kathy Brewer	<b>COMPLIANCE STATUS:</b> Compliance	
<b>SUBJECT:</b> on site inspection of all processes in ROP to verify permanently disabled. Facility has requested ROP be voided due to closure of Midland MI facility		<b>SOURCE CLASS:</b> MEGASITE
<b>RESOLVED COMPLAINTS:</b>		

**SK Saran Contacts: Brad Blanchard EH&S Specialist; Dan Kaczynski, Site Leader**

**Kyle Galbraith, Process Engineer**

The facility manufactured polyvinylidene chloride, or PVDC, resins used in a variety of packaging applications, including monolayer extrusion, flexible and rigid multilayer extrusion and extrusion coating applications.

In March 2019, ROP Significant Modification 2019000090 was submitted by Dow to EGLE requesting that a new, individual ROP be issued to SK Saran that incorporates the stationary source assets previously in MI-ROP-A4033-2017b, now owned by SK Saran. On March 25, 2021, MI-ROP-P1026-2021 was issued to SK Saran for EU35, FGSARANTTU, FGMONMACT and FGCOLDCLEANERS.

The requirements of 40 CFR Part 63, Subparts A and FFFF and the equipment leak provisions of 40 CFR Part 63, Subpart H applied to the SK Saran site permitted processes. CAM subject emission devices for VOC and HAPs were in EU35-S3 and FGSARAN TTU.

**SK Saran emissions reported to MAERs for 2020**

Pollutant	Amount
VOC	6977 Lbs
PM10	1880 Lbs
CO	2641 Lbs
NOx	579 Lbs

On June 30, 2021, SK Saran submitted a request to void ROP MI-ROP-P1026-2021 (formerly Section 3 of MI-ROP-A4033-2017b). The facility had ceased operations on June 15, 2021.

While on site I reviewed EU35 process and SARANTTU. During the walkthrough raw material transport, intermediate material handling and valves, process exhaust vent lines, and control devices were viewed. All areas evaluated indicate the facility has thoroughly decommissioned production areas and control devices subject to air regulations and ROP MI-ROP-P1026-2021 can be voided.

**Attachments**

**June 2021 request to void ROP MI-ROP-P1026-2021****Process and control devices decommissioned and method used to decommission****File review****ROP Semi annual deviation reports September 2020, March 2021, September 2021****MACT FFFF (MON) March 2021, September 2021****EU35: Decommissioned**

**EU35 is the suspension resin polymerization and finishing processes in the SARAN polymer manufacturing plant permitted in PTI 246-04 with reactors, separators, dryers, storage tanks/silos and related equipment located in 564, 590, 591, 967, 988, and 989 Buildings. Exhaust from the slurry tank, drying, blending, dry screening, and packaging operations were controlled by scrubbers, cyclones or baghouses. Portions of the process vented to the SARAN TTU, FGSARANTTU located in 989 Building.**

**During the walkthrough we observed the air gapped line for vinylidene raw material supply to the VDC process. The rails for loading raw material to the Methyl Acrylate process have been removed. Intermediate material transfer pumps have also been air gapped. Material handling pumps, process equipment including dewatering, and, cyclone and scrubber control devices have been air gapped. Storage silos are empty and opened to the air incapable of venting to filters.**

**The vent lines to SARANTTU have also been air gapped.**

**The following areas were confirmed to be decommissioned**

<b>Description</b>	<b>Operations ID</b>
<b>VDC supply to plant</b>	<b>DO-824J</b>
<b>MA supply to plant</b>	<b>DO-462H</b>
<b>3 Train Process transfer pump</b>	<b>DO-112Z (P-703)</b>
<b>3 Train Centrifuge</b>	<b>DO-118Z( CF-703)</b>
<b>4 Train Process transfer pump</b>	<b>DO-579F (P-0770)</b>
<b>4 Train Centrifuge</b>	<b>DO-118Y( CF-0771)</b>

**FGSARANTTU: Decommissioned**

EU02 owned and operated by Corteva ( SRN P1028) stopped venting to SARAN TTU prior to June 15, 2021. On July 19 , 2021, Corteva on notified the AQD that the SARAN TTU had been shut down and the process system control for it has been removed as of July 19 at 9:00 a.m. EU02 transitioned process exhaust venting to the 954 Throx on April 29, 2021.

The face of the SARANTTU has been removed as well as the lances that connected to the face for natural gas and vents from EU02 and SK Saran processes.

The following areas were confirmed to be decommissioned

Description	Operations ID
Natural gas line to SARANTTU	DO-227H
Natural gas line to SARANTTU	DO-268H
Dry surge vent/lance to SARANTTU	DO-266H
827 surge vent/lance to SARANTTU	DO-205H, (Enviro tag 268)
V1V2 surge vent/lance to SARANTTU	DO-261H, (enviro tag 267)
SARANTTU Face plate	

**FGCOLDCLEANERS: Decommissioned**

The cold cleaner had been removed from the SK Saran Midland MI site.

Sourcewide:

**Asbestos 40 CFR Part 61 Subpart M**

SK Saran has hired Bierlein to perform demolition of former SK Saran Midland MI site process areas. The scope of the demolition contract included Bierlein conducting pre-demolition surveys, submitting required notifications and completing demolition activities in compliance with applicable state and federal asbestos regulations.

**Site Remediation 40 CFR Part 63 Subpart GGGGG**

**SK Saran has no on site remediation activities. Dow Chemical owns and is responsible for any Dow iPark property remediation activities.**

**Stack/Vents: Decommissioned**

**All stacks vents have had emission source vent lines air gapped prior to the stack.**

**Annual and Semi Annual Title 5 Deviation report review**

**No deviations**

**MON MACT FFFF reports**

**No deviations, excursions, exceedances, monitoring downtime or leaks associated with SK Saran MON subject processes. Inspections (Annual or Semiannual) conducted 11/1/2020, May 10, 2021, May 28, 2021.**

**No startup, shutdown or malfunction events that caused applicable emission limit to be exceeded.**

**AECOM has been contracted to provide any future reporting required after December 2021.**

NAME

DATE 11/5/2021

SUPERVISOR

