

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection**

A579744269

FACILITY: COOPER STANDARD AUTOMOTIVE		SRN / ID: A5797
LOCATION: 594 ALPINE RD, GAYLORD		DISTRICT: Cadillac
CITY: GAYLORD		COUNTY: OTSEGO
CONTACT: Jim Lekandis , Health, Safety & Environmental Specialist		ACTIVITY DATE: 04/24/2018
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection of this opt out source.		
RESOLVED COMPLAINTS:		

I performed an inspection at this facility per the conditions of Permit to Install Number 62-90C. James Lekandis, EH&S Manager, accompanied me on the inspection. This facility extrudes and assembles trim for the automotive industry. Both green and cured rubber is used in this process. Adhesive is applied to assemble various parts. Following are the findings of this inspection.

#### EUCLEANUP

According to previous inspection reports, this emission unit has not been used since approximately 2004. This was confirmed by Mr. Lekandis during my inspection.

#### FG-ExtLines

This group consists of five rubber extrusion lines followed by adhesive coating lines and a natural gas fired curing oven. Emissions of concern for this group are Volatile Organic Compounds (VOCs). The VOC emissions from the coating application portion of this group are limited to 26.1 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. The VOC emissions from the rubber extrusion and hot air cure portion of this group are limited to 6.3 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. Calculations performed by the facility indicate VOC emissions from the coating application processes were 14.0 tons per year and from the hot air cure were 1.5 tons per year both based on a 12-month rolling time period as determined at the end of each calendar month.

Compliance with these emission limits is through process material VOC content limits, process material usage limits, emissions calculations, and recordkeeping. Coatings used in the coating application portion of this group are limited to 4.5 pounds of VOC per gallon of coating, minus water, as applied. These values are obtained through manufacturer certified EPA and SARA information sheets. The facility uses two different coatings (which are actually adhesives); Flocklock 835A and Flocklock 550P. The facility uses these materials as supplied. A review of coating manufacturers data for these coatings demonstrated the 835A material contained 4.22 pounds of VOC per gallon of coating, minus water, as applied and the 550P material contained 2.59 pounds of VOC per gallon of coating, minus water, as applied. Material usage for coatings and rubber is tracked through monthly purchasing records. These records were available for review. There is no limit on coating usage. Rubber usage is limited to 6,500,000 pounds of rubber per 12-month rolling time period as determined at the end of each calendar month. Records supplied by the facility indicate usage of 3,820,989 pounds of rubber in the last 12 months.

All waste coatings generated at this line are to be collected and stored in closed containers to minimize fugitive VOC emissions. Upon inspection, it was noted that they are. Additionally, the disposal of sponge and wipe applicators is to be done in a manner that would minimize emissions. The facility manifests these as waste along with waste coatings and they are disposed of by an appropriate contractor.

There is a total of 15 stacks associated with this group. Inspection of these indicated that they appeared compliant with minimum height and maximum diameter restrictions listed in their permit and they do not appear to have been recently modified.

**FG-Molds**

This group consists of 13 rubber production mold processes. There are no specific emission limitations on this group, rather, emissions are limited by process restrictions. Specifically, the facility can process no more than 260,000 pounds of rubber through this group per 12-month rolling time period as determined at the end of each calendar month. Usage of this is tracked through purchasing records. A review of these records a review of records indicates the facility processed 7853 pounds of rubber in the last 12 months.

There is a total of two stacks associated with this group. Inspection of these indicated that they appeared compliant with minimum height and maximum diameter restrictions listed in their permit and they do not appear to have been recently modified.

**FG-FACILITY**

The Hazardous Air Pollutant (HAP) emissions from the facility are limited to 9.0 tons per year for each individual HAP and 22.5 tons per year of aggregate HAPs both based on a 12-month rolling time period as determined at the end of each calendar month. Calculations performed by the facility indicate HAP emissions from the facility in the last 12 months were 1.5 tons.

Compliance with these emission limits is through emissions calculations based on material HAP content and usage. The only material containing HAP at the facility is the 835A adhesive. HAP values used in the emissions calculations are obtained through manufacturer certified EPA and SARA information sheets. Material usage for this coating is tracked through monthly purchasing records. These records were available for review.

This inspection indicates the facility appears in compliance with their air permitting. No further action is recommended.

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