

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

A644556984

FACILITY: VIBRACOUSTIC USA, INC.		SRN / ID: A6445
LOCATION: 180 DAWSON ST, SANDUSKY		DISTRICT: Bay City
CITY: SANDUSKY		COUNTY: SANILAC
CONTACT: Deb Sopczynski , HR Manager		ACTIVITY DATE: 01/28/2021
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Inspection of PTI 145-07C.		
RESOLVED COMPLAINTS:		

I (glm) conducted an on-site, scheduled inspection at Vibracoustic (facility) in Sandusky on January 27, 2021. Vibracoustic has 1 active permit which is a title V opt-out permit (PTI 145-07C). I met with Deb Sopczynski, HSE/Document Control Coordinator, who maintains the recordkeeping for the PTI and Mr. George Tice, HSE Manager.

Facility Description

Vibracoustic is an automotive parts supplier in Sandusky. It produces various rubber parts for reducing vibrations within metal components for the automotive industry.

Compliance Determination

At the time of the inspection the facility appeared to be in compliance with PTI 145-07C and applicable state and federal regulations.

EUGUSBI

Rotary polyurethane injection molding machine. This unit no longer exists.

EUINJECTIONMOLD

This emission unit consists of 50 injection molding presses which include the use of mold release agents. No pollution control devices are associated with this emission unit.

Special condition (SC) I.1. limits VOC emissions to less than 9.1 ton per year (tpy) from the use of mold release in EUINJECTIONMOLD. SC VI.4 is the associated monitoring and recordkeeping requirement that requires the facility to maintain the following information on a monthly basis: gallons (with water) of each mold release agent and agent reducer used, VOC content (with water) of each mold release agent and agent reducer as applied, VOC mass emission calculations determining the monthly emission rate in tons per calendar month and VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. VOC emissions for the use of mold release were 1.9 tpy for the 12-month rolling time period ending December 2020.

SC I.2. restricts VOC and acetone combined from the use of solvent-based marking inks in EUINJECTIONMOLD. SC VI.5 is the associated monitoring and recordkeeping requirement that requires the facility to maintain the following information on a monthly basis: gallons (with water) of each coating and reducer used, VOC and acetone content (with water) of each coating and reducer as applied, VOC and acetone mass emission calculations determining the monthly combined emission rate in tons per calendar month and VOC and acetone mass emission

calculations determining the annual combined emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. Trelleborg has switched to water based inks and no release agents have been used during 2020, therefore the VOC and Acetone combined emissions were 0.01 tpy for the same rolling time period.

SC II.1. limits the amount of rubber processed in the 50 injection mold presses per year based upon a 12-month rolling time period as determined at the end of each calendar month to not more than 6,000 tons of rubber. For the 12-month rolling time period ending December 2020 the facility processed 1758 tons of rubber.

EUINJECTIONMOLD2

This emission unit is permitted for 10 injection molding presses which include the use of mold release agents, solvent based inks and rubber compounds. The facility has one molding press installed under this emission unit.

SC II.1. restricts the plant from processing more than 600 tons of rubber in EUINJECTIONMOLD2 per year based upon a 12-month rolling time period as determined at the end of the calendar month. The facility was not tracking this usage separately at the time of the inspection. Moving forward they plan to track separately. According to Mr. Tice, an appropriate estimated usage can be determined by dividing total usage among each of the 51 presses. Accordingly, estimated material usage on this press was approximately 34.5 ton for the 12-month rolling time period ending December 2020.

SC II.2., 3 and 4 restrict material usage of Compound #11, Compound #14 and Compound #22, respectively. According to Mr. Tice and Ms. Sopczynski the facility has not process these compounds and the plant has only used natural rubber. Therefore, usage for all three compounds for the 12-month rolling time period ending December 2020 was 0.0 tpy.

SC II.5. restricts use of solvent-based mold release agents. The facility uses only water based mold release agents.

SC III.1. requires the facility to capture all waste materials and to store them in closed containers. During the walk through of the facility I did not observe open waste containers.

EUAIRSTRIPPER

This emission unit is an air stripper with activated carbon control. The air stripper is used as a remediation technology to mitigate a legacy groundwater plume.

At the time of inspection, the carbon control system was in place, operating properly, and a replacement was on hand.

SC I.1. restricts VOC emissions to less than 1.9 tpy, based on a 12-month rolling time period as determined at the end of each calendar month. SC VI.2. is the associated monitoring and recordkeeping requirement that requires the facility to monitor and record the flow rate and total VOC concentration of influent and effluent water streams of the air stripper on a monthly basis. Monthly samples shall be collected at the same time as the carbon breakthrough checks required in SC VI.3. VOC emissions were 0.1 tpy based on the 12-month rolling time period ending December 2020.

I observed records for the emissions associated with this unit and at the time of inspection the actual emissions were under the limits. In addition, carbon break through is monitored at least every two weeks and the facility maintains breakthrough and maintenance logs. Breakthrough on the carbon absorption unit has not occurred for some time due to the low volume of VOCs being processed through the canister.

EUSOIL

This emission unit is a soil vapor extraction (SVE) unit with activated carbon control. The SVE is used as a remediation technology to mitigate a legacy soil vapor plume.

The soil vapor extraction process uses steam regenerating activated carbon control. During my inspection the system was not running. The system shuts itself off when the water table gets too high. This emission unit requires monitoring influent and effluent VOC streams from the carbon system. The required records were current and available. SC I.1. limits VOC emissions to 2.5 tpy, based on a 12-month rolling time period as determined at the end of each calendar month. SC VI.2. is the associated monitoring and recordkeeping requirement that requires the facility to record the flow rate and total VOC concentration of the influent stream to the activated carbon control of EUSOIL on a monthly basis, and the effluent stream of the activated carbon control on a quarterly basis. VOC emissions for the 12-month rolling time period ending December 2020 was 0.0 tpy. Records of canister changes, date/time, and the hours of process operation between changes were complete.

FGFACILITY

This group consists of all process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment. The facility has the potential to emit greater than 25 tpy of aggregated hazardous air pollutants (HAPs) and 10 tpy of an individual HAP, therefore the facility received PTI 145-07C to restrict their potential to opt-out of the Title V program. SC I.1. and I.2. restricts each individual HAP to less than 10 tpy and aggregate HAPs to less than 25 tpy, based on a 12-month rolling time period as determined at the end of the calendar month. SC VI.2. is the associated monitoring and recordkeeping requirement that requires the facility to maintain on a monthly basis individual and aggregate HAP emission calculations. In addition, a site-wide VOC limit of less than 90 tpy, based on a 12-month rolling time period as determined at the end of each calendar month is set in SC I.3. SC VI.3. is the associated monitoring and recordkeeping requirement that requires the facility to maintain on a monthly basis VOC emission calculations. For the 12-month rolling time period ending December 2020 VOC emissions were 2.0 tpy and aggregate HAPs were 0.5 tpy. Carbon Disulfide was the upper bound individual HAPs emissions at 0.26 tpy.

I found the facility to be in compliance with its opt-out permit and the air rules during the time of my inspection.



NAME _____

DATE 2/17/2021

SUPERVISOR _____

