

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

B187730353

FACILITY: GUARDIAN INDUSTRIES		SRN / ID: B1877
LOCATION: 14600 ROMINE RD, CARLETON		DISTRICT: Jackson
CITY: CARLETON		COUNTY: MONROE
CONTACT: Laura Rye, Compliance Engineer		ACTIVITY DATE: 07/21/2015
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection, compliance test, and RATA.		
RESOLVED COMPLAINTS:		

Company Contact: Laura Rye, Compliance Engineer
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Michael Gabor, Zachary Durham, and I arrived at the facility and met with Laura Rye, John Medvich (Engineering Technician), and Tim Lemmon (Engineering Manager) of Guardian Industries. We went to a conference room to discuss the inspection that I was conducting today. As we were discussing the inspection, Mark Dziadosz (AQD – TPU) arrived to observe the stack test that was being conducted on that same day. Before we started the inspection, Laura took Michael, Mark, Zack, and I on a tour that gave an overview of the process that they used to make glass.

After the tour, Mark was taken to where the Line #2 stack test was being conducted and the rest of us went back to the offices to discuss upcoming plant activities and review records that they were required to keep. We first discussed the upcoming Cold Tank Repair (CTR) that is scheduled for Line 2 in August, 2016. They went over what they were planning to do during the CTR and what then we over what they should include in their letter to notify AQD what they planning to do and how it was exempt from needing a new permit to install. They then produced the all records that I had requested to see as required. The following is the summary for each table in their current ROP in my determination of their status of compliance:

EU00079

This table covers Line #1 which produces flat glass using the float method. I have reviewed the spreadsheets for the time period of July 2014 through June 2015 and any data that they had up to the date of the inspection. These spreadsheets show all the materials and the amounts that they used to make their glass. Since this is confidential material, I returned the spreadsheets to them after my review. The spreadsheet for Line #1 showed that they are in compliance with their PM limits in Section I of this table. It also showed that their raw glass production was under 450 tons/day for that time period, which is below their limit of 550 tons/day. They are also in compliance with their salt cake to sand ratio limits for both clear glass and tinted glass. These spreadsheets meet the requirements of Section VI of this table. I have determined that they are in compliance with this table.

EU00080

This table covers Line #2 which produces flat glass using the float method with a control device consisting of a dry scrubber, particulate filter, and Selective Catalytic Reduction (SCR). They were conducting stack tests today to determine compliance with the emission limits in Section I of this table per Special Conditions (SC) V.1 through 3. They will also be conducting a RATA to certify the NO_x, SO₂ and flow CEMS (SC IV.3, VI.3, and Appendix 11). They completed construction of the control device on April 13, 2015 and started using the glass manufacturing HAP materials on June 24, 2015. They submitted notifications of these activities on April 15, 2015 and July 10, 2015, respectively (SC VII.4-6). At the time of the inspection they told me that they have not had abnormally low production rate days or needed to maintenance on the control device therefore they had not had to use the equations in SC I.11 through 14 or needed to bypass the control device per SC III.2. I have reviewed the spreadsheets for the time period of July 2014 through June 2015 and any data that they had up to the date of the inspection (SC VI.1 and VI.5). These spreadsheets show all the materials and the amounts that they used to make their glass. Since this is confidential material, I returned the spreadsheets to them after my review. The spreadsheet for Line #2 showed that they are in compliance with their PM limits in Section I of this table. It also showed that their raw glass production was well under their limit of 650 tons/day. They can only burn natural gas in this emission unit and they are monitoring and recording natural gas usage rates (SC II.2 and VI.2). They submitted their proposed malfunction abatement plan on July 14, 2015 for my review (SC III.1). I have since

responded to them with comments and a request for additional information that I would like to see included in the plan. At the time of the inspection, the control device was in operation and the ancillary equipment was operating properly (SC IV.1, IV.2, IV.5, IV.6, and IV.7).

EUSEAMER

This table covers a seamer that utilizes a belt sander to remove sharp edges from the glass with the dust generated being collected by a baghouse. The seamer was not in operation at the time of the inspection. They are inspecting the dust collector on a daily basis and recording the pressure drop of the baghouse (see attached). The records show that they are in compliance with their CAM plan. I determined that they are in compliance with this table.

EUDUSTL1

This table covers a pulse jet dust collection used to filter glass particles from Line #1 crushing operation. This glass crusher was in operation at the time of the inspection and I did not see any visible emissions coming from the exhaust of the dust collector. They are inspecting the dust collector on a daily basis and recording the pressure drop of the baghouse (see attached). The records show that they are in compliance with their CAM plan. I determined that they are in compliance with this table.

EUDUSTL2

This table covers a pulse jet dust collection used to filter glass particles from Line #2 crushing operation. This glass crusher was in operation at the time of the inspection and I did not see any visible emissions coming from the exhaust of the dust collector. They are inspecting the dust collector on a daily basis and recording the pressure drop of the baghouse (see attached). The records show that they are in compliance with their CAM plan. I determined that they are in compliance with this table.

EUWASTESILO

This table covers an 800 ft³ Line #2 air pollution control system waste silo equipped with a passive bin vent. This silo is on the east side of the waste management building. It was in operation at the time of the inspection and I did not see any visible emissions from the bin vent filter that is located on top of the silo. I determined that they are in compliance with this table.

EUWMBUILDING

This table covers Line #2 air pollution control system waste loading occurring in the waste management building. This dust collector does not vent to the out of the building and all emissions are contained within the building. They are planning on requesting this table be removed from the ROP during the next modification or renewal of the ROP. I determined that they are in compliance with this table.

FG00097

This table covers two diesel oil fired emergency backup electrical generators with a maximum rated capacity of 2500 brake horsepower (BHP) each. I then reviewed the records for FG 00097 (EUGENERATOR 1 and 2). They are using ultra low sulfur diesel fuel (5 ppm) for those generators, which is well below their limit of 0.04% sulfur by weight in the diesel fuel. They are keeping track of the operating hours and the amount of fuel consumed in the generators. They are below their limits of 51,000 gallons per 12 month rolling time period (~11,400 gallons consumed in 2014) and 700 generator-hours per 12 month rolling time period (~30 hours of operation in 2014).

They are maintaining the records required in Section VI of this table. I determined that they are in compliance with this table.

FG00098

This table covers any cold cleaners that are on site at this facility. The cold cleaners that they use at this facility use either mineral spirits or citrus based solvents. The cold cleaners were closed and not being used at the time of the inspection. I determined that they are in compliance with this table.

FGFACILITY

This table covers all process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment. Based on their thruputs they reported in their MAERS submittal, they emitted 2.93 pounds of HAPS total in 2014. I determined that they are in compliance with this table.

Follow-up

Mark Dziadosz emailed me to let me know that the RATA that was to occur later in the week was cancelled. The

facility and the testers were not matching on SO₂. The facility was consistently reading 15-20 ppm and the testers were reading around 8 ppm. The RATA has since been rescheduled for August 27, 2015.

August 27, 2015 RATA

Mark and I arrived at the facility to observe the rescheduled RATA. The first 3 runs seemed to be running smooth until the tester's condenser malfunctioned. While the testers were repairing/replacing the condenser, a review of the results of the first 3 runs of the RATA was done. It was determined that the facility flow CEMS was reading ~10,000 scfm lower than what the tester's equipment was reading. After about 3 hours of trouble shooting, it was determined that the facility's DAHS was using a correction factor on the flow readings and causing it to be reading lower than the tester's equipment. Once that was corrected, the two systems were reading flow more in sync with each other. Because they made a change to the system, they were required to throw out the original first 3 runs and start the RATA over. I had time constraints and I had to leave before the start of the first run, but Mark was hoping to stay for the first 3 runs. The next day I received an email from John Medvich stating that the RATA was completed around 10:30 pm the previous night. John said that the initial reports looked very good and that they will send us the official report once they receive it.

Based on the information that I received during the stack test and the rescheduled RATA, I am making the assumption that the results of the stack test and the RATA will show that they are meeting the conditions of their ROP. Therefore I have determined that they are in compliance with their ROP based on the inspection, the review of their records, and a review of the reports that they have submitted.

NAME Brian Carley

DATE 9/3/15

SUPERVISOR [Signature]

