

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

B233730677

FACILITY: VCF Films, Inc.	SRN / ID: B2337
LOCATION: 1100 Sutton Avenue, HOWELL	DISTRICT: Lansing
CITY: HOWELL	COUNTY: LIVINGSTON
CONTACT: Sabine Lucks, General Manager	ACTIVITY DATE: 08/18/2015
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance
SUBJECT: Announced, scheduled compliance inspection.	SOURCE CLASS: MAJOR
RESOLVED COMPLAINTS:	

Inspected by: Michelle Luplow

Personnel Present: Cliff Lichlyter (c.lichlyter@sbcglobal.net), Consultant
Sabine Lucks (slucks@vcffilms.com), VCF General Manager

Purpose: Conduct an announced, scheduled, partial compliance evaluation (PCE) inspection by determining compliance with VCF Films' (VCF) ROP, MI-ROP-B2337-2014. This activity was done as part of a full compliance evaluation (FCE).

Facility Background/Regulatory Overview: VCF Films (VCF) is in the industry of producing a variety of polyvinyl chloride (PVC) films for research and development and for production.

VCF requested termination of consent order AQD No. 12-2003 December 11, 2013. The Notice of Termination of this consent order was issued May 2, 2014 per G. Vinson Hellwig, Chief of AQD at the time. VCF currently has another active consent order, SIP No. 3-1993, which has been incorporated into the ROP EUBANDCASTER conditions.

A stack test was conducted on April 9, 2013 for the RTO associated with the Pilot Coating Line (EUPCOATLINE). Nathan Hude, TPU, was present onsite during the stack test. The Regenerative Thermal Oxidizer (RTO) averaged a destruction efficiency of 98.9%. VCF passed the stack test.

Inspection: At approximately 9:00 a.m. on August 18, 2015 I met with C. Lichlyter and S. Lucks for an announced, scheduled inspection. I provided C. Lichlyter with a DEQ "Environmental Inspections: Rights and Responsibilities" brochure during the 2013 inspection.

S. Lucks classified VCF Films' production as "idle" at this time. She said VCF last had production in August 2013. Since that time they have not produced any product (for production or pilot testing/R&D). The 2014 MAERS report shows that none of the emission units operated except for one of the boilers, which was used to heat the building.

C. Lichlyter and S. Lucks said that VCF has disposed of all of their solvents, raw materials, and applied for status as a large quantity generator for hazardous waste to dispose of these items.

On 3/16/15 S. Lucks notified us that the number of VCF employees decreased from 24 down to 1 (herself).

We took a tour of the facility and determined the following (Table 1):

Table 1

Emission Unit ID	Description	Operating Status/Condition
EUBANDCASTER	3 bandcasters used to produced 600 lb/hr of film product; plastic resin and THF blended to create film sheets, product dried in Tenter Frame oven, controlled by carbon adsorption system	Was operated last in August 2012. The THF reclamation/distillation unit tank farm have since been decommissioned: All of the reclamation/distillation units have been emptied, many of these units have become rusted through, parts have rusted off, etc. The Tenter Frame oven has been permanently electrically dismantled, and half the parts of the oven have been scrapped or sold. The dyes for the bandcaster units are also sold.
EURESINHANDLING	Pneumatic plastic resin handling	Still present onsite and functional, but there are no raw materials to be run through the silo.
EU-PCoatLine	Slot die pilot coating line, controlled by RTO	Last operated in August 2013. Is still operational. VCF is keeping it operational until a customer purchases the unit (C. Lichlyter said they would need to see it working prior to purchase, hence the need to keep it operational), or until they decide to donate the unit. The small blending vessels that

		support this unit, as well as the hood used to control emissions from the small blending vessels are still present and functional.
EU-BLEND	Blending from EURESINHANDLING using EUBANDCASTER blender vessels	The blending vessels are still present; have not been used since August 2012
3 Boilers	(not included in ROP, exempt from boiler MACT) gas-fired boilers used to heat building and a must-have for EUBANDCASTER operation	All 3 decommissioned. S. Lucks said the state boiler inspector came in late Dec 2013 to verify that the gas lines had been permanently disconnected from the boilers. EUBANDCASTER relied on heat from these boilers to operate. Without the boilers, EUBANDCASTER is rendered permanently inoperable.

In addition to the units mentioned in Table 1, the slitters, choppers, and all their connections have been completely removed from the site.

Based on the tour of the facility, EUBANDCASTER (and the Tenter Frame oven) are rendered inoperable and do not have the capability of being utilized ever again. EUBLEND vessels are therefore no longer needed (no product is being produced, therefore no mixing is necessary). EURESINHANDLING is also no longer needed as raw materials are no longer being used at the facility (the necessity for this unit is no longer there).

I mentioned to S. Lucks and C. Lichlyter that it would be beneficial for VCF to conduct another Potential to Emit determination, using only EU-PCoatLine as the potential source of emissions. The other units can no longer produce emissions. The Potential to Emit determination would then help VCF in determining if having an ROP is even necessary at this point. I also mentioned that if the PTE is below major source thresholds they can also be removed from MAERS and no longer have to pay the major source annual fee.

Because VCF has not operated/produced any product since 2013, I did not request any emissions data, raw material content data, material usage data, or check compliance with any of the remaining conditions; there is no data to process.

VCF is in compliance with all applicable state and federal regulations, as well as the conditions in ROP MI-ROP-B2337-2014, at this time.

NAME Michelle M Lybitt

DATE 8-18-15

SUPERVISOR B.M.