

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

B292749623

FACILITY: Alpha Resins, LLC		SRN / ID: B2927
LOCATION: 17350 Ryan Rd, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Jack Shanholtz , Environmental Engineer		ACTIVITY DATE: 07/22/2019
STAFF: Jorge Acevedo	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

COMPANY NAME : Alpha Resins

FACILITY ADDRESS :

STATE REGISTRAT. NUMBER : B2927

SIC CODE :

EPA SOURCE CLASS :

EPA POLLUTANT CLASS :

LEVEL OF INSPECTION : PCE

DATE OF INSPECTION : 7/22/19

TIME OF INSPECTION : 1:05 PM

DATE OF REPORT : 08/23/19

REASON FOR INSPECTION : Scheduled Inspection

INSPECTED BY : Jorge Acevedo

PERSONNEL PRESENT : Marco Ortega, Plant Manager
Jack Shanholtz, Consultant
Kent Lewis

FACILITY PHONE NUMBER : (313)

FACILITY FAX NUMBER : (313)

INSPECTION NARRATIVE:

On July 22, 2019, I conducted a partial compliance evaluation of Alpha Resins. I arrived at 1:05 PM and met with Jack Shanholtz, Consultant and Marco Ortega, Plant Manager. I explained the purpose of the inspection. I asked for any updates since the last inspection. Mr. Shanholtz explained that the company, Alpha Resins, was acquired by Covia. Of note, Reactor K has not been in use since sometime in 2012. Mr. Shanholtz described that operations were not having significant issues. In Building H, Mr. Shanholtz explained that in Building H, the pressure drop sensor might be having some minor issues because the sensor was having negative readings. I asked to see records required by the PTI. Mr. Shanholtz provided me with operation logs and records required by the PTI. I scanned the records and they appeared to be in compliance with the PTI conditions. I requested copies of the records for a two year period. Mr. Shanholtz said he would get them to me as soon as possible. I reviewed the scrubber logs for the past several years. The pH was above 9.0 which shows compliance with the permit. Mr. Shanholtz said some systems in Building K were removed that were able to make resin.

After reviewing the records, we proceeded to go into the facility for the inspection. We started in Building D. There were four reactors and two blend tanks. In the tanks, a base resin is combined with other materials to meet customer specifications. For the most part, the resins manufactured in the tanks for Foundry applications. Next, I observed the ammonia scrubber. The meter measuring the pH read 9.57. Next, we walked in the room housing the four reactors. Two reactors are dedicated to foundry resins, the other two are for Novalac resins. The scrubber controlling emissions from the reactors had a pressure drop of 1.5.

We then went into the boiler room and generation building. I observed two boilers. The facility was only using one boiler and the other boiler was on standby. I examined the working boiler and copied the relevant information:

York Shipley
Model - S76C-53D-5300-NLN
S/N 12-22558

I then saw the emergency generator. It was not running at the time of the inspection. I took down the relevant information:

**Kohler Power Systems
S/N- SGM322CLX
Model No. 400REZXB**

The installation date was listed as July 2012. The hour meter on the generator read 37.9 hours. Next, we walked into Building M, where raw materials were stored. Next, we went into Building H. In Building H, Resin is pumped into it. There were two pastillator lines. Tanks 401, 402, and 403 are hold tanks which feed the process. Tanks 421 and Tanks 422 provide additional filtering. The two lines are fed resin, which are cooled through the line and form pellets at the end. The product is used in the hydraulic fracturing industry. Only one line was running at the time of the inspection. After observing Building H, we walked outside. I observed the 200 tank farm. The tanks appeared to be in good condition.

We entered Buildings F and G. I observed the methanol storage log. The manometer was on the wall. Staff verify that there is a nitrogen blanket on the tanks and record the value.

We went back outside and observed the phenol unloading process. They receive two rail cars a week and unload to the tank farm. Approximately, each unloading process accounts for 35000 gallons for each unloading event. There are three tanks dedicated for phenol storage.

Mr. Shanholtz pointed out Building K. Building K has been out of service since 2012 and now is used primarily for raw material storage. The control devices, thermal oxidizer and scrubber were also out of service.

We walked back into the conference room and went over the inspection. I requested the records required by the permit. I left the facility at 2:30PM.

FACILITY BACKGROUND:

Alpha Resins manufactures organic resins primarily for the foundry industry. The facility is located North of McNichols Rd., West of Mound Rd., South of Nevada St., and East of Conant St. in Detroit.

COMPLAINT/COMPLIANCE HISTORY:

Complaints were received last year, but facility made changes to their operations to resolve the odors. Offsite odors were not detected at the time of the inspection.

OUTSTANDING CONSENT ORDERS:

None

OUTSTANDING LOVs

None

OPERATING SCHEDULE/PRODUCTION RATE:

Alpha Resins operates two shifts, five days a week.

PROCESS DESCRIPTION:

Alpha Resins produces organic resins for the foundry industry.

EQUIPMENT AND PROCESS CONTROLS:

51 Tanks Ranging from 6000 gallons to 25000 gallons
5 Blend Tanks
3 Reactors
2 Boilers and 1 Emergency Generator
Several Loading Racks- 2 Inbound and 3 Outbound
2 Pastillator lines

APPLICABLE RULES/PERMIT CONDITIONS:

Permit to Install 157-10C was issued on December 4, 2014. Compliance with the permit conditions are evaluated below.

The following conditions apply to:
EUBOILER1

DESCRIPTION: Natural gas fired boiler rated at less than 16 mmBtu/hr

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

1. The permittee shall burn only natural gas in EUBOILER1. (R 336.1205, R 336.1225, R 336.1702, R 336.1901, 40 CFR 52.21(c) & (d), 40 CFR Part 60 Subparts Dc)

Compliance- Natural gas is only burned in Boiler.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The heat input capacity of EUBOILER1 shall not exceed a maximum of 16.0 MM BTU per hour. (R 336.1205, 40 CFR 52.21(c) & (d), 40 CFR Part 60 Subpart Dc)

Compliance- Boiler is rated at 16 mmBTU/hr heat input capacity.

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall monitor, in a satisfactory manner, the natural gas usage rate for EUBOILER1 on a monthly basis. (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) and (d),

40 CFR 60.48c(g))

Compliance- Records are kept.

2. The permittee shall keep, in a satisfactory manner, all monthly fuel use records for EUBOILER1, as required by SC VI.1., on file at the facility and make them available to the Department upon request. (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) and (d), 40 CFR 60.48c(g))

Compliance- Records are kept and were received.

3. The permittee shall monitor emissions, operating information, and keep records for EUBOILER1 in accordance with the federal Standards of Performance for New Stationary Sources as specified in

40 CFR Part 60 Subparts A and Dc. The permittee shall make all records available to the Department upon request. (40 CFR Part 60 Subparts A and Dc)

Compliance- Emissions are calculated monthly and records were received demonstrating this.

VII. REPORTING

1. The permittee shall provide written notification of construction and operation to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7. (40 CFR 60.7)

Compliance- Notice was received.

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBOILER1	36	28.6	40 CFR 52.21(c) & (d)

Undetermined- Measurements were not taken but height and diameter of the stack appeared correct.

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and Dc, as they apply to EUBOILER1. (40 CFR Part 60 Subparts A & Dc)

Compliance- Facility is complying with 40 CFR 60 Subparts A & Dc. Facility only burns natural gas in boiler and keeps record of usage.

The following conditions apply to:
EUBACKUPGEN

DESCRIPTION: 500 kW (or less) natural gas fired emergency generator

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

1. The permittee shall demonstrate compliance for EUBACKUPGEN with the emission limits under 40 CFR Part 60, Subpart JJJJ. (40 CFR 60 Subpart JJJJ)

Compliance- Facility bought compliant generator

II. MATERIAL LIMITS

1. The permittee shall burn only pipeline quality natural gas in EUBACKUPGEN. (R 336.1205(3), R 336.1225, 40 CFR 60.4230)

Compliance- Facility only burns natural gas in generator.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EUBACKUPGEN greater than 500 hours per year, based on a 12-month rolling time period. (R 336.1205(3), R 336.1225, 40 CFR 52.21 (c) & (d))

Compliance- Records are kept and were provided. Hours are less than 500 hours.

2. The permittee may operate EUBACKUPGEN for no more than 100 hours per 12-month rolling time period as determined at the end of each calendar month for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per year. (40 CFR 60.4243(d))

Compliance- Less than 100 hours a year for maintenance checks and readiness testing. Records were provided.

3. The permittee shall install, maintain, and operate EUBACKUPGEN and any control device according to the manufacturer's emission-related written instructions, over the entire life of the engine. In addition, the permittee may only change those settings that are permitted by the manufacturer. The permittee shall also meet the applicable requirements of 40 CFR part 1068. ((R 336.1205(1)(a) & (3), R 336.1225, R 336.1910, 40 CFR 52.21(c) & (d), 40 CFR 60.4234, 40 CFR 60.4243(a))

Compliance- Facility is operating generator according to manufacturer's instructions.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a non-resettable device to monitor and record the hours of operation for EUBACKUPGEN. (R 336.1205(3), R 336.1225, 40 CFR 52.21 (c) & (d), 40 CFR 60.4237)

Compliance- Hour meter is installed.

2. The nameplate capacity of EUBACKUPGEN shall not exceed 500 kW, as certified by the equipment manufacturer. (R 336.1205(1)(a) & (3), 40 CFR 60.4230(a))

Compliance- Capacity is 500kW.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. Within 180 days after commencement of trial operation, the permittee shall verify NO_x, CO, and VOC emission rates from EUBACKUPGEN, by testing at owner's expense, in accordance with Department requirements or by providing manufacturer certification documentation as required in SC VI.2. If testing is to be performed, the permittee must submit a complete stack-testing plan to the AQD. No less than 60 days prior to testing, the permittee must submit a complete stack-testing plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. (R 336.2001, R 336.2003, R 336.2004, 40 CFR 60.4244, 40 CFR 60.4245(a))
Compliance- Certification was provided.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(1)(a) & (3), 40 CFR 52.21 (c) & (d))
Compliance- Calculations are done monthly.
2. The permittee shall keep, in a satisfactory manner, a record of testing required in SC V.1 or manufacturer certification documentation indicating that EUBACKUPGEN meets the applicable emission limitations contained in the federal Standards of Performance for New Stationary Sources 40 CFR Part 60 Subpart JJJJ. The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.4245(a))
Compliance- Certification was provided with application.
3. The permittee shall monitor and record the hours of operation of EUBACKUPGEN during emergencies and non-emergencies, on a monthly and 12-month rolling time period basis, in a manner acceptable to the District Supervisor, Air Quality Division. The permittee shall record the time of operation of EUBACKUPGEN and the reason it was in operation during that time. (R 336.1205(1)(a) & (3), 40 CFR 60.4243(d))

Compliance- Records are kept regarding use.

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUBACKUPGEN. (R 336.1201(7)(a))

Compliance- Notification was submitted.

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBACKUPGEN	12	28.6	R 336.1225

Undetermined- Stack height and diameter were not measured but appeared to be correct.

IX. OTHER REQUIREMENTS

- 1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and JJJJ, as they apply to EUBACKUPGEN. (40 CFR Part 60 Subparts A & JJJJ)
Compliance- Facility is compliance with provisions of Subparts A and JJJJ by keeping records of hour usage.**

The following conditions apply to:
FG200TANKFARM

DESCRIPTION: 200 Tank Farm – solvents

Emission Units: EUTANK201, EUTANK202, EUTANK203, EUTANK204, EUTANK205, EUTANK206, EUTANK207, EUTANK208, EUTANK209, EUTANK210, EUTANK211, EUTANK212, EUTANK213, EUTANK214

POLLUTION CONTROL EQUIPMENT: Nitrogen blanket on EUTANK207

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUTANK207 unless the nitrogen blanket system is installed, maintained, and operated in a satisfactory manner. (R 336.1205, R 336.1702, R 336.1901, R 336.1910)
Compliance- Nitrogen blanket system was installed. Received log of pressure readings for Tank207

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

The following conditions apply to:
FGBUILDINGD

DESCRIPTION: Phenolic/formaldehyde resins and furfuryl alcohol resins production housed in Building D. Consists of reactors and blend tanks.

Emission Units: EUREACTOR2, EUREACTOR3, EUREACTOR4, EUREACTOR5, EUREACTOR6, EUBLENDTANK11, EUBLENDTANK12, EUBLENDTANK14, EUBLENDTANK15, EUBLENDTANK16, EUBLENDTANK16OV

POLLUTION CONTROL EQUIPMENT: Main scrubber, ammonia scrubber

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Compliance Determination
1. Formaldehyde	114 lb/yr ¹	12-month rolling time period as determined at the end of each calendar month	EUREACTOR5 and EUREACTOR6	Compliance- Emissions were well below 114 lb/yr. Records were received.

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate FGBUILDINGD unless all applicable provisions of Rule 631 are met. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)

Compliance- Records were receive regarding resin production and emission calculations. Based on emission calculations and resin production, compliance with Rule 631 is met.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate any FGBUILDINGD reactor or blend tank unless the main scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the main scrubber includes, but is not limited to, maintaining a minimum pressure drop across the plate of 0.7 inches water gauge. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)

Compliance- Log of pressure drop readings was received. Review of the log indicates that compliance is being met.

2. The permittee shall not operate EUREACTOR3, EUREACTOR4, EUREACTOR5, or EUREACTOR6 unless the ammonia scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the ammonia scrubber includes, but is not limited to, maintaining a minimum scrubber liquid pH of 9.0. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)

Compliance- pH log is kept and was received. Readings appear to be above the minimum requirement of 9.0.

3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor the main scrubber pressure drop on a continuous basis. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)

Compliance- Pressure drop meter is installed and measuring pressure drop continuously.

4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor the ammonia scrubber liquid pH on a continuous basis. (R 336.1205, R 336.1631, R 336.1901,

R 336.1910)

Compliance- A device is installed and monitoring pH on a continuous basis.

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep, in a satisfactory manner, all daily records of the main scrubber pressure drop for days that any FGBUILDINGD reactor or blend tank is in operation on file at the facility and make them available to the Department upon request. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)

Compliance- Pressure drop records are kept and were received.

2. The permittee shall keep, in a satisfactory manner, all daily records of the ammonia scrubber liquid pH for days that EUREACTOR3, EUREACTOR4, EUREACTOR5, or EUREACTOR6 is in operation on file at the facility and make them available to the Department upon request. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)

Compliance- pH records are kept and were received.

3. The permittee shall keep records for FGBUILDINGD as specified in Rule 631(6) to show compliance with Rule 631. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205, R 336.1631, R 336.1901)

Compliance- Records on resin production and VOC emission calculations are kept.

4. The permittee shall keep, in a satisfactory manner, formaldehyde emission calculations determining the total annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month from EUREACTOR5 and EUREACTOR6, as required by SC I.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ (R 336.1225)

Compliance- Formaldehyde emission calculations are kept and were received.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVSCRUBBER	32 ¹	56 ¹	R 336.1225

Undetermined- Height and Diameter were not measured but they appeared to be accurate during inspection.

IX. OTHER REQUIREMENTS

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply to:
FGBUILDINGK

DESCRIPTION: Alkyd production housed in Building K. Consists of one active reactor (EUREACTORK1) and several other reactors used for other purposes.

Emission Units: EUREACTORK1, EUREACTORK2, EUREACTORK3, EUREACTORK4, EUREACTORK5, EUBLENDTANK18, EUTANK322

POLLUTION CONTROL EQUIPMENT: Scrubber (Shutte Koerting Type 7010 Cast Iron Eductor), thermal oxidizer (Hirt Combustion Engineering)

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate FGBUILDINGK unless all applicable provisions of Rule 631 are met. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)
Compliance- Building K has been out of service since 2012.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUREACTORK1 unless the scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the scrubber includes, but is not limited to, maintaining a minimum liquid flow rate of 30 gallons per minute. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)
Compliance- Building K has been out of service since 2012.

2. The permittee shall not operate EUREACTORK1 unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes a minimum VOC destruction efficiency of 90 percent (by weight), and maintaining a minimum temperature of 600 °F and a minimum retention time of 0.5 seconds. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)
Compliance- Building K has been out of service since 2012.

3. The permittee shall equip and maintain the FGBUILDINGK scrubber with a device to monitor the liquid flow rate, on a continuous basis, during operation of EUREACTORK1. (R 336.1205, R 336.1901, R 336.1910)
Compliance- Building K has been out of service since 2012.

4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a temperature monitoring device in the combustion chamber of the thermal oxidizer to monitor and record the temperature, on a continuous basis, during operation of EUREACTORK1. (R 336.1205, R 336.1901, R 336.1910)
Compliance- Building K has been out of service since 2012.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))
NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall monitor and record, in a satisfactory manner, the temperature in the combustion chamber of the thermal oxidizer, on a continuous basis, during operation of EUREACTORK1. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)
Compliance- Building K has been out of service since 2012.

2. The permittee shall keep, in a satisfactory manner, all daily records of the scrubber liquid flow rate for days that EUREACTORK1 is in operation on file at the facility and make them available to the Department upon request. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)
Compliance- Building K has been out of service since 2012.

3. The permittee shall keep, in a satisfactory manner, operating temperature records for the thermal oxidizer as required by SC VI.1. If the measured operating temperature of the thermal oxidizer falls below 600 °F during operation of EUREACTORK1, the permittee may demonstrate compliance based upon a three-hour average temperature, by calculating the average operating temperature for each three hour period which includes one or more temperature readings below 600 °F. The permittee shall keep all records and calculations on file at the facility and make them available to the Department upon request. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)
Compliance- Building K has been out of service since 2012.

4. The permittee shall keep records for FGBUILDINGK as specified in Rule 631(6) to show compliance with Rule 631. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205, R 336.1631, R 336.1901)
Compliance- Building K has been out of service since 2012.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVOXIDIZER	16 ¹	29 ¹	R 336.1901

Compliance- Building K has been out of service since 2012.

IX. OTHER REQUIREMENTS

NA

Footnotes:¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply to:
FGBUILDINGG

DESCRIPTION: Group of blending tanks housed in Building G

Emission Units: EUBLENDTANK10, EUBLENDTANK13, EUBLENDTANK17, EUBSBLENDTANK, EUFSBLENDTANK1, EUFSBLENDTANK2

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate FGBUILDINGG unless all applicable provisions of Rule 631 are met. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)

Compliance- Emission calculations were provided along with resin production.

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep records for FGBUILDINGG as specified in Rule 631(6) to show compliance with Rule 631. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205, R 336.1631, R 336.1901)

Compliance- Emission calculations were provided along with resin production.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

The following conditions apply Source-Wide to:
FGFACILITY

DESCRIPTION: All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method Underlying Applicable Requirements
1. Each Individual HAP	8.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	Compliance-HAP emissions consist of formaldehyde and phenol of which are well below 8.9TPY each. Records were provided.
2. Aggregate HAPs	22.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	Compliance-HAP emissions consist of formaldehyde and phenol of which are well below 8.9TPY each. Records were provided.

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate FGFACILITY unless all applicable provisions of Rule 631 are met. (R 336.1205, R 336.1631, R 336.1901, R 336.1910)
Compliance- Emission calculations were provided along with resin production.

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall keep records for FGFACILITY as specified in Rule 631(6) to show compliance with Rule 631. The permittee shall keep all records on file at the facility and make them available to the

Department upon request. (R 336.1205, R 336.1631, R 336.1901)

Compliance- Emission calculations were provided along with resin production.

2. The permittee shall keep, in a satisfactory manner, individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month, as required by SC I.1 and I.2. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205(3))
Compliance- Emission calculations were provided.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

**APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:
N/A**

MAERS REPORT REVIEW:

Pollutant	2018 Emissions(TPY)
CO	4.06
NOx	0.95
PM	0.33
Sox	0
VOC	0.49

FINAL COMPLIANCE DETERMINATION:

It appears the facility is operating in compliance with applicable regulations.

NAME 

DATE 7-22-19

SUPERVISOR W.M.