

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : ASAMA COLDWATER MANUFACTURING, INC.	SRN : N5814
Location : 180 ASAMA Parkway	District : Kalamazoo
	County : BRANCH
City : COLDWATER State: MI Zip Code : 49036	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Rex Lane
FCE Begin Date : 9/8/2015	FCE Completion Date : 9/8/2016
Comments : ROP Section 1 (ACM): Compliant / ROP Section 2 (GCI): Non-compliant	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/01/2016	CEMS Test Observation	Compliance	Annual RATA: EU-MCS-S1
08/23/2016	Self Initiated Inspection	Non Compliance	ROP Section 1 (Asama Coldwater Mfg.): Compliant ROP Section 2 (Gokoh Coldwater Inc.): Non-compliant
08/10/2016	CEM RATA	Compliance	2016 Cylinder Gas Audit (3rd Quarter): EU-MCS-S1 Cylinder Gas Audit (CGA) was performed on 7/13/16 using two audit gases (Hexane - required by 40 CFR Part 63, Subpart EEEEE) of known concentration at 20 - 30% and 50 - 60% of system span. Cylinder gas certification sheets were provided with the report. CGA error for the low-level and mid-level spans were 6.88% and 12.50% respectively which is below the test requirement (< 15%) allowance under 40 CFR Part 60, Appendix F. The facility did not include an ROP certification report with this quarterly report. Staff emailed Mr. Chad Marsh (attached) reminding him that for any report submitted to the AQD, a signed and dated ROP certification report should be included with the report. When the ROP certification report is received for the 3rd quarter CGA report, it will be put in the file. -RIL

Activity Date	Activity Type	Compliance Status	Comments
08/02/2016	ROP Semi 1 Cert	Compliance	<p>ROP Semi-annual Report - GCI ROP Section 2 (1/1/16 - 6/30/16)</p> <p>ROP certification states that the facility was in compliance with all ROP terms and conditions during the reporting period. The report contains an original dated signature by GCI's responsible official. -RIL</p>
06/21/2016	CEM RATA	Compliance	<p>2016 Cylinder Gas Audit (2nd Quarter); EU-MCS-S1</p> <p>Cylinder Gas Audit (CGA) was performed on 4/8/16 using two audit gases (Hexane - required by 40 CFR Part 63, Subpart EEEEE) of known concentration at 20 - 30% and 50 - 60% of system span. Cylinder gas certification sheets were provided with the report. CGA error for the low-level and mid-level spans were 7.94% and 12.75% respectively which is below the test requirement (< 15%) allowance under 40 CFR Part 60, Appendix F. The facility did not include an ROP certification report with this quarterly report (i.e. included with 1st quarter report). Staff will remind facility that for any report submitted to the AQD, a signed and dated ROP certification report should be included with the report. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
05/17/2016	MAERS	Compliance	<p>ACM MAERS Report Audit:</p> <p>Activity code 30400331 was added for splitting emissions 50/50 between mold making and shakeout. AQD ID EU0028 (EU-MCS) listed as dismantled 5/9/15 on removal report. This appears to be a glitch because no dismantle date shows on the EU summary page in the MAERS report. Initial report shows two stack errors (SVMPCC and SVSS) where horizontal collection method must be entered. Staff will review method chosen for other stacks. Paper submittal used "023" for horizontal collection method which is no longer allowed. All other stacks listed "030" for horizontal collection method so staff used this value for the remaining two stacks which resolved both errors. Staff revised report to split CO and VOC emissions by 50% for the two activity codes associated with RGSANDSYSTEM. Reported VOC emissions for GCI-MISC was changed from 10,294 pounds to 16,075 based on mass balance calculation of activity detail since documentation was not attached to the report. -RIL</p>
05/02/2016	MACT (Part 63)	Compliance	<p>GCI: Semi-annual Visible Emission Test - 40 CFR Part 63, Subpart EEEEE</p> <p>Facility is required to perform semi-annual visible emission observations of building vents and openings under the foundry MACT. Testing was performed on 4/13/16 by a current EPA Method 9 certified reader. No visible emissions were observed during this semi-annual test period. An ROP certification report was attached to the test report and has an original dated signature by the facility's responsible official for Section 2.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/11/2016	MACT (Part 63)	Compliance	<p>40 CFR Part 63, Subpart EEEEE: Six Month Visible Emissions Report</p> <p>ROP certification report was attached to the VE report and contains an original dated signature by the facility's responsible official. Observations were performed on 3/14/16 and all readings were zero percent opacity and readings were performed by an observer that has a current Method 9 certification. -RIL</p>
03/30/2016	ROP SEMI 2 CERT	Compliance	<p>Gokoh Coldwater Inc. ROP semi-annual certification report: 7/1/15 - 12/31/15</p> <p>Report is signed and dated by the facility's responsible official. Facility reports no deviations of MI -ROP-N5814-2015, Section 2 during the reporting period. -RIL</p>
03/30/2016	ROP Annual Cert	Compliance	<p>Gokoh Coldwater Inc. ROP annual certification report: 1/1/15 - 12/31/15</p> <p>Report is signed and dated by the facility's responsible official and identifies scrubber flow deviations that occurred in January 2015 and were previously reported under Rule 912 and ROP deviation report. Facility submitted a revision to their O&M/SSM plan to address scrubber flow deviations on 3/31/15 and this was approved by MDEQ on 5/14/15. -RIL</p>
03/30/2016	ROP SEMI 2 CERT	Compliance	<p>ACM ROP semi-annual certification report: 7/1/15 - 12/31/15</p> <p>Report contains an original dated signature by the facility's responsible official. The facility reported deviations for late submittal of the ROP semi-annual report and conducting visible emission observations outside of six-month window requirement under 40 CFR Part 63, Subpart EEEEE. Violation notices were sent for these deviations on 10/8/15 and 1/7/16 and both VNs are considered to be resolved at this time. -RIL</p>

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03/30/2016	ROP Annual Cert	Compliance	<p>ACM ROP annual certification report: 1/1/15 - 12/31/15</p> <p>Report is signed and dated by the facility's responsible official. Facility reported two deviations related to the VOHAP CEMS monitor that occurred in January 2015 following repair and restart of the CEMS monitor and during fuel tank switch out that caused flame out of CEMS FID that were reported previously. A violation notice was not sent for these deviations due to the short duration of both events. The facility also reported deviations for late submittal of the ROP semi-annual report and conducting visible emission observations outside of six-month window requirement under 40 CFR Part 63, Subpart EEEEE. Violation notices were sent for these deviations on 10/8/15 and 1/7/16 and both VNs are considered to be resolved at this time. -RIL</p>
02/09/2016	CEM RATA		<p>2016 Cylinder Gas Audit (1st Quarter): EU-MCS-S1</p> <p>Cylinder Gas Audit (CGA) was performed on 1/15/16 using two audit gases (Hexane - required by 40 CFR Part 63, Subpart EEEEE) of known concentration at 20 - 30% and 50 - 60% of system span. Cylinder gas certification sheets were provided with the report. CGA error for the low-level and mid-level spans were 0.79% and 5.56% respectively which is well below the test requirement (< 15%) allowance under 40 CFR Part 60, Appendix F. The ROP certification report was attached and contained an original dated signature by the facility's responsible official. -RIL</p>

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01/28/2016	MACT (Part 63)	Compliance	<p>Gokoh Coldwater Inc. - 40 CFR Part 63, Subpart EEEEE Semi-annual Compliance Report</p> <p>Report is signed and dated by the responsible official for Section 2 of MI-ROP-N5814-2015. Report states that there were no SSM events during the reporting period that required implementation of the facility's SSM plan. The report also states that there were no deviations from the operating parameters established in the O&M plan and no periods during the reporting period where the continuous parameter monitoring system was out of control as defined in 40 CFR 63.8. -RIL</p>
01/05/2016	MACT (Part 63)	Non Compliance	<p>Semi-annual Visible Emission Test - 40 CFR Part 63, Subpart EEEEE</p> <p>Facility is required to perform visible emission observations of building vents and openings under the foundry MACT no less frequently than once every six months. Testing was performed on 12/9/15 by a current EPA Method 9 certified reader. No visible emissions were observed during this semi-annual test period. Test report was attached to the ROP certification form. The ROP certification form has an original dated signature by the facility's responsible official. Because the previous visible observation test was conducted on 5/6/15, the 12/9/15 observation is slightly more than one month overdue. After discussion with district supervisor, decision was made to send a violation notice to the facility. -RIL</p>
12/09/2015	Telephone Notes		<p>Notification of Semi-annual Visible Emissions Test - 40 CFR Part 63, EEEEE</p>

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12/02/2015	MACT (Part 63)	Compliance	<p>GCI: Semi-annual Visible Emission Test - 40 CFR Part 63, Subpart EEEEE</p> <p>Facility is required to perform semi-annual visible emission observations of building vents and openings under the foundry MACT. Testing was performed on 11/23/15 by a current EPA Method 9 certified reader. No visible emissions were observed during this semi-annual test period. Test report was attached to a cover letter that has an original dated signature by the facility's responsible official for Section 2. Staff emailed GCI's contact on 12/2/15 reminding the facility that any future reports should also include an ROP certification report that is signed and dated by the responsible official. -RIL</p>
12/01/2015	CEM RATA	Compliance	<p>4th Quarter Cylinder Gas Audit Report</p> <p>Cylinder Gas Audit (CGA) was performed on 10/27/15 using two audit gases (Hexane - required by 40 CFR Part 63, Subpart EEEEE) of known concentration at 20 - 30% and 50 - 60% of system span. Cylinder gas certification sheets were provided with the report. CGA error for the low-level and mid-level spans were 0.79% and 5.56% respectively which is well below the test requirement (< 15%) allowance under 40 CFR Part 60, Appendix F. The ROP certification report was attached and contained an original dated signature by the facility's responsible official. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
10/20/2015	ROP Semi 1 Cert	Compliance	<p>Review of first 2015 semi-annual compliance certification report</p> <p>Facility was sent a violation notice on 10/8/15 for non-submittal of the semi-annual ROP certification report. Report was received on 10/21/15 and contains an original dated signature by the facility's responsible official. The facility reported a total of three deviations: one for late submittal of the semi-annual certification report and two deviations associated with the repair to the VOHAP CEMS monitor and replacement of FID fuel tank cylinder and delay in opening tank valve which caused FID flame out. The last two reported deviations totaled five hours and facility reports that the thermal oxidizer was operating normally through these two deviations. Violation notice is considered to be resolved with submittal of the semi-annual certification report. A violation notice will not be sent for the reported deviations. -RIL</p>
10/06/2015	ROP Semi 1 Cert	Compliance	<p>Gokoh Coldwater Inc. - 1st Semi-annual ROP certification report (2015): 1/1/15 - 6/30/15</p> <p>Report signed and dated by the facility's responsible official and identifies scrubber flow deviations that occurred in January 2015 and were previously reported under Rule 912 and ROP deviation report. Facility submitted a revision to their O&M/SSM plan to address scrubber flow deviations on 3/31/15 and this was approved by MDEQ on 5/14/15. This semi-annual certification report appears to be redundant to a report our office received on 7/7/15. -RIL</p>

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10/05/2015	CEM RATA	Compliance	<p>EU-MCS-S1: 2015 Relative Accuracy Test Audit Report</p> <p>A signed and dated ROP certification report was included with the RATA report. Nine 25-minute samples were collected from the RTO exhaust for EU-MCS-S1 for comparison to the CEMS monitor. The reference monitor averaged 0.2 - 0.3 ppm higher THC concentration than the CEMS during the RATA test. Relative accuracy was 1.42% of the 20 ppm (hexane) emission limit under 40 CFR Part 63, Subpart EEEEE which is below 10% of the applicable standard required under Performance Specification 2 of 40 CFR Part 60, Appendix B. -RIL</p>

Name: RIL Date: 9/8/16 Supervisor: MA 9/9/2016

