

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Records Review (In office)

N581455114

FACILITY: ASAMA COLDWATER MANUFACTURING, INC.		SRN / ID: N5814
LOCATION: 180 ASAMA Parkway, COLDWATER		DISTRICT: Kalamazoo
CITY: COLDWATER		COUNTY: BRANCH
CONTACT: Darrin Mynhier , Quality Manager - GCI		ACTIVITY DATE: 09/14/2020
STAFF: Amanda Chapel	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

On Wednesday July 15, 2020, Air Quality Division's (AQD) Amanda Chapel (staff), conducted an announced walk-through inspection of the Gokoh Coldwater, Inc (GCI) facility was part of the compliance inspection of ACM and GCI as one single source as defined under MI-ROP-5814-2015. Due to the COVID-19 pandemic, inspections are announced, and the records review portion is completed separately through e-mailed records. Records were requested and they are due on July 22, 2020. The following is the records review portions of the inspection conducted on July 15, 2020.

The first batch of records were received on July 21, 2020. The remaining records were requested to be submitted no later than July 24, 2020. Emissions are being tracked in a spreadsheet that was submitted for the records review.

EU-SHELLCORE-S2

Submitted VOC records show that 44 tons of sand were used in January, February, March, and June 2020. There were 22 tons of sand used in May and 0 in April due to the COVID-19 shutdown. Facility reports the highest 12-month rolling VOC emissions reported are 0.00050 tons which is well below the 1.0 tpy 12-month rolling limit.

EU-SILOS-S2

The amount of sand is being delivered is being tracked by the facility. In February 2020, the facility had 631.8 tons of sand delivered. The 12-month rolling total tons per year throughput is also being tracked. The highest 12-month rolling throughput total is 8,630.30 tpy in December 2019 which is below the 25,000 tpy permit limit.

PM emissions are being tracked monthly, based on sand throughput, and as on a 12-month rolling time period. The PM permit limit for a 12-month rolling time period is 2.50 tpy. According to the submitted records, the highest 12-month rolling PM emission was January 2020 with 0.84 tpy emitted. This is well below the permitted amount.

Visible emissions readings were submitted. VEs appear to be completed by non-certified readers. No visible emissions were reported at any point in 2019. Records of pressure drop readings appear to be recorded daily. There do appear to be some dates missing but this could also be attributed to COVID and interruptions of normal production schedules. None of the readings appear to be outside the recommended water drop range. Dust collector barrels appear to be tracked as well and changed when they are about 1/2 full.

Facility submitted a copy of their MAP for the silos. It was last updated in September 2012. Facility should reevaluate the existing MAP and update any outdated areas.

EU-LAEMPE#1AND#2-S2

The facility is required to track Resin Part A, Resin Part B, and TEA used in the process. The records show the facility is tracking a resin Part A, B, and C which is an additive in the process. The facility is also tracking triethylamine gas (TEA). The permit limits are 115 tpy on a 12-month rolling basis for Parts A and B and 35 tpy 12-month rolling for the TEA. Spreadsheets indicate that highest usage for Resin Part A, B, and TEA was in November 2019. Resin Part A highest usage was 39.24 tpy, Part B was 78.83 tpy, and TEA usage was 19.93 tpy.

The facility is tracking the amount of sand used that is processed through EU-LAEMPE#1AND#2. The amount of sand processed is multiplied by the VOC emission rate which was established during testing. The VOC emissions are tracked monthly and on a 12-month rolling basis. The highest 12-month rolling VOC emission was in November 2019 and was 0.57 tpy which is well below the permit limit of 1.54 tpy.

Staff submitted the scrubber tracking spreadsheets for review. The magnehelic reading, pH level, and flow rate are being recorded by the data acquisition handling system every 15 minutes for each scrubber.

Staff spoke to the permit engineer who is working on the new GCI permit to remove GCI from the ROP program about the Resin Part C, which is being tracked but is not identified in the permit. The engineer will enquire about this additive and it will possibly be incorporated into the new permit.


The facility submitted copies of the last two GCI 2019 ROP compliance certifications as required by the NESHAP EEEEE. They reported no deviations from the O&M plan during the reporting periods.

EU-MICELLANEOUS-S2

The facility is tracking a core release agent and metal cleaner under this emission unit. The records show in 2019 the core release agent has no VOCs and the metal cleaner is 100% VOC. In conversation with Mr. Darrin Mynhier, he stated the facility switched their core release agent in 2020 and the core release agent now contains 3.84 lb/gal of VOC.

Mr. Mynhier submitted all the SDS for the facility via email. These included all the ingredients in the resin, metal cleaner, and mold release used at the facility.

The facility appears to be in compliance with the records requirements in MI-ROP-5814-2015.

NAME 

DATE 9/14/2020

SUPERVISOR RIL 9/23/20