

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : GCI GOKOH COLDWATER INC	SRN : N5904
Location : 100 CONCEPT DR	District : Kalamazoo
	County : BRANCH
City : COLDWATER State: MI Zip Code : 49036	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Rex Lane
FCE Begin Date : 9/16/2013	FCE Completion Date : 9/24/2014
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/16/2014	Self Initiated Inspection	Non Compliance	
09/16/2014	Self Initiated Inspection	Non Compliance	Self Initiated Inspection Summary

Activity Date	Activity Type	Compliance Status	Comments
07/28/2014	MACT (Part 63)	Compliance	<p>Review of Semi-annual MACT, Subpart EEEEE Report</p> <p>Facility is not currently covered under an ROP, therefore, their MACT report did not include an ROP certification report, however, the report was signed by the responsible official. Facility reported no startups, shutdowns or malfunctions during the reporting period. The facility reports that there were no deviations from the operating parameters established in their O & M plan for the reporting period and no periods when the continuous parameter monitoring system was not in operation. Previously reported in their January 30, 2014 report, there were daily and monthly preventative maintenance and inspection logs that were not done or recorded in accordance with the approved O & M plan. Staff sent a violation notice on 2/24/14 for these reported deviations. The facility's response to the violation notice was received on 3/12/14 and appeared to adequately address the cited violation. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
06/04/2014	MACT (Part 63)	Compliance	<p>MACT, Subpart EEEEE: Semi-annual Visible Emission Observations</p> <p>In October 2012, the MDEQ-AQD made a determination that Gokoh Coldwater Inc. (GCI) was part of the same stationary source (SS) as Asama Coldwater Manufacturing (ACM). ACM is a major source of HAPs and is subject to 40 CFR Part 63, Subpart EEEEE (Foundry MACT). Based on the SS determination, the cold box core making lines at GCI are now subject to Foundry MACT requirements, including semi-annual visible emission (VE) observation requirements under 40 CFR 63.7731(b). Pursuant to 63.7732(d), VE observations may be conducted for fugitive emissions from each opening or vent from the building or structure that houses the cold box core equipment or the certified observer may identify a limited number of openings or vents that appear to have the highest opacities and perform VE observations of the identified openings or vents for compliance with the opacity limit under 40 CFR 63.7690(a)(7).</p> <p>Pursuant to the VE test report dated May 28, 2014, VE testing was conducted on May 5, 2014 by a certified reader of each cold box core machine process stack for three one-hour periods. No opacity value greater than 0% was noted during the three one-hour observations per the report which demonstrates compliance with 40 CFR 63.7690(a)(7).</p> <p>Once the ROP permit is issued to ACM which include applicable requirements for GCI (ROP Section 2), future GCI VE test reports will need to include an ROP certification report signed and dated by the facility's responsible official. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
05/16/2014	MAERS	Compliance	<p>Review of 2013 MAERS Report:</p> <p>Source submitted MAERS this reporting year because they were determined to be part of the same stationary source that includes an ROP/PSD major source, Asama Coldwater Manufacturing (ACM), (SRN: N5814). MAERS report emission unit naming convention aligns with their current PTI No. 162-11A. Emission documentation was attached to the MAERS report.</p> <p>Source type ROP field was changed to "major" with AQD comment added regarding status of ACM's ROP renewal and incorporating GCI's PTI No. 162-11A into this renewal. MACT flag was also checked on EU-LAEMPE#1 and #2. Facility used EPA emission factor basis for three of four emission units. Where MAERS emissions factors existed (SCC codes 30400370, 30400350 and 30400371) for certain pollutants; staff modified the report to use the MAERS EF which slightly increased or decreased reported NOX, PM10 filterable and SOX emissions. GCI's MAERS data will be incorporated into ACM's MAERS report for 2014. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
10/10/2013	MACT (Part 63)	Compliance	<p>Notification of Compliance Status Report - MACT, Subpart EEEEE</p> <p>Report appears to contain all of the required elements under 40 CFR 63.9(h)(i) in a Notification of Compliance Status Report (NOCSR). Pursuant to 40 CFR 63.9(h)(ii), the notification must be sent before close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard. The facility completed the performance test of the acid wet scrubbers on their cold box core machines on 5/30/13 and submitted the test results on 7/19/13. The NOCSR should have been submitted on or before 7/30/13 so the report is not timely. The facility entered into Administrative Consent Order No. 9-2013 on August 6, 2013 to address violations of MACT, Subpart EEEEE. A violation notice will not be sent at this time.</p> <p>-RIL</p>

Name: RIL

Date: 9/24/14

Supervisor: MA 9/25/2014