

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Rex Performance Products	SRN : N6944
Location : 2700 Wills Road	District : Southeast Michigan
	County : SAINT CLAIR
City : MARYSVILLE State: MI Zip Code : 48040	Compliance Status : Compliance
Source Class : MAJOR	Staff : Sebastian Kallumkal
FCE Begin Date : 1/1/2015	FCE Completion Date : 9/12/2016
Comments : Based on the inspection and review of the submitted reports, the facility appears to be in compliance with all the applicable air quality requirements.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/12/2016	Malfunction Abatement Plan	Compliance	Under review. Requested more information.
08/31/2016	ROP Other	Compliance	Installation notification for EXTRUDER4 and RECLAIM2. Received via email on 8/31/2016. Hardcopy received on September 6, 2016.
08/19/2016	Scheduled Inspection	Compliance	Onsite Inspection
08/11/2016	Excess Emissions (CEM)	Compliance	2nd Quarter 2016 Emissions Reports. TPY (12-month rolling) VOC=162.14; Isobutane = 527.28 The report shows that the daily VOC emissions and isobutane usages are in compliance with the permit limits. The calibration results are under review by TPU staff.

Activity Date	Activity Type	Compliance Status	Comments
05/16/2016	Telephone Notes	Compliance	<p>Mr. Tate explained that they made many improvements to their CAMS and is working properly. The RATA was done last August. Hence he requested to remove the VOC testing and RATA testing that was included in the draft PTI for the installation of Extruder 4 and Reclaim 2. Explained to him that their monitor previously had many problems and that is why the testing was included. He blamed the power company for some of the monitor problems. Informed him that AQD will consider his request and if monitor was showing performance problems, RATA will be required annually. Contacted Jeff Rathbun, AQD Permit Engineer and told him about the discussion. We discussed and agreed to keep the RATA every two years and make the VOC testing optional.</p>
05/13/2016	Excess Emissions (CEM)	Compliance	<p>Ist Quarter 2016 Emissions Reports. TPY (12-month rolling) VOC=172.86; Isobutane = 497.20 The report shows that the daily VOC emissions and isobutane usages are in compliance with the permit limits. TPU reviewed and found the calibration results in compliance.</p>
04/26/2016	MAERS	Compliance	<p>MAERS Report Submission Signed. Received by email on 4/25/2016. Hardcopy to be mailed.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/20/2016	Telephone Notes		Discussed Violation Notice and MAERS Certification Submittal. - REX will send the Certification form for MAERS - AQD explained why the VN was sent and the response needed. Excess downtime after the major downtime in September. Need a compliance plan for the monitoring unit which should be operating all the time. - REX will request AQD to void the Consent Order. Need to show how REX complied with CO in order to void it. - REX is confused about what they are doing wrong with the new permit application. AQD offered to talk to the permit Engineer about it.
03/24/2016	Telephone Notes	Compliance	Daniel Shwanick, Jeff Rathburn, Sebastian Kallumkal-AQD Michael Cuff, Jeff Smith-REX Performance Discussed deficiencies in the PTI application. Will submit corrected spreadsheet, will show how to reduce the more emissions (BACT analysis), no more changes or additions, new calculations, not going to change the monitor. Daniel accepted usage for high CE for BACT analysis and emission calculations. Will submit construction waiver if necessary (may be only installing more ICS units).
03/21/2016	ROP SEMI 2 CERT	Non Compliance	Facility had many instances of CEMS not operating on the weekends due to gas for the burners went out of calibration due to plant shut down. The monitor needs to be operated 24 hours per day and 7 days per week. VN will be sent.
03/21/2016	ROP Annual Cert	Non Compliance	Facility had many instances of CEMS not operating on the weekends due to gas for the burners went out of calibration due to plant shut down. The monitor needs to be operated 24 hours per day and 7 days per week. VN will be sent.
03/03/2016	Excess Emissions (CEM)	Compliance	4th Quarter 2015 Emissions Reports. Daily and Annual VOC emissions and Isobutane usage in compliance.

Activity Date	Activity Type	Compliance Status	Comments
03/03/2016	Telephone Notes	Compliance	John informed me that they submitted the PTI application for the new extruder. Inquired if they can start the construction of the project because the equipment is arriving earlier than expected. Told him about Rule 202-Construction Waiver. He agreed to send in the request. Talked Paul Schleusener, AQD Permit Engineer about the Rule 1802 for PSD requirements related to construction waiver. He informed me that major construction is only applicable if it is currently a major source for PSD. Currently REX is not a major source of PSD, so Rule 1802 is not applicable.
11/25/2015	Excess Emissions (CEM)	Compliance	3rd Quarter 2015 Emissions Reports. TPU reviewed the QA results
09/03/2015	ROP Semi 1 Cert	Non Compliance	Excess monitor downtime. TPU send VN. Advised John V about proper completion of the report. Agreed to complete the report properly in the future. (Received emailed copies earlier.Hard copy received on 9/3/2015)
09/02/2015	Excess Emissions (CEM)	Non Compliance	Excess monitor downtime. TPU sent VN.
08/31/2015	Self Initiated Inspection	Non Compliance	Onsite Inspection
08/04/2015	CEMS Test Observation	Compliance	RATA test for the monitor
05/11/2015	Excess Emissions (CEM)	Compliance	1st Quarter 2015 Emissions Reports.
04/14/2015	MAERS	Compliance	MAERS Report. Reviewed and uploaded.
02/11/2015	ROP SEMI 2 CERT	Compliance	Deviations due to maintenance, out of calibrations, power outage, communication error, etc. All corrected. In compliance. Received paper copy on 2/13/2015
02/11/2015	ROP Annual Cert	Compliance	Deviations corrected. No violation notice required.Received paper copy on 2/13/2015
02/10/2015	Excess Emissions (CEM)	Compliance	Emailed quarterly excess emissions report along with calibration and PTE Smoke. Received paper copy on 2/13/2015.

Name: Subodhraj Kallimkal Date: 9/14/16

Supervisor: Joye