

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> ASAMA COLDWATER MANUFACTURING, INC.	<b>SRN :</b> N5814
<b>Location :</b> 180 ASAMA Parkway	<b>District :</b> Kalamazoo
	<b>County :</b> BRANCH
<b>City :</b> COLDWATER <b>State:</b> MI <b>Zip Code :</b> 49036	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Amanda Chapel
<b>FCE Begin Date :</b> 9/14/2019	<b>FCE Completion Date :</b> 9/14/2020
<b>Comments :</b>	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
09/14/2020	Records Review (In office)	Compliance	
09/14/2020	Records Review (In office)	Compliance	
09/10/2020	Stack Test Observation	Compliance	
08/24/2020	Excess Emissions (CEM)	Compliance	<p>The facility submitted an ROP certification with original signature from the responsible official for the Excess Emission Report Jan 1 - Mar 31, 2020 and Excess Emission Report Apr 1 - June 30, 2020. The report from Jan 1 to Mar 31, 2020 is considered late.</p> <p>During the time period of Jan 1 to Mar 31, the facility reported downtime due to 3 hours of malfunctions and 57 hours of other unknown causes. Total downtime was 4.8% of the source operation time. Monitor was out of service after Christmas for 57 hours after production started. Staff kept manual logs of monitoring start up and shutdowns and other actions.</p> <p>From April 1 to June 30, the facility reported 2 hours of monitor malfunctions totaling 0.3% of the total run time. "No sample available" reported for 2 hours during operation.</p>

Activity Date	Activity Type	Compliance Status	Comments
07/15/2020	Scheduled Inspection	Compliance	
07/14/2020	Stack Test Observation	Compliance	
06/25/2020	CEM RATA	Compliance	<p>Second quarter Cylinder Gas Audit performed by Monitoring Solutions at Asama Coldwater Manufacturing on May 29, 2020. Submittal of this report complies with Appendix 3 Condition No. 4.</p> <p>Report shows the THC parameter with a Low Gas Error of 2.45 and Mid Gas Error of 1.22. Both of which are passing.</p>
06/23/2020	Stack Test Observation	Compliance	
06/23/2020	Scheduled Inspection	Compliance	
03/06/2020	ROP Annual Cert	Compliance	Facility submitted the ROP Annual Compliance Certification with an original signature and date. The facility indicated that during the entire reporting period, the source was in compliance with all terms and conditions contained in the ROP.
03/06/2020	ROP SEMI 2 CERT	Compliance	Facility submitted the ROP Semi-Annual Compliance Certification with an original signature and date. The facility indicated that during the entire reporting period, the source was in compliance with all terms and conditions contained in the ROP.
03/06/2020	MACT (Part 63)	Compliance	<p>Iron &amp; Steel MACT Standard, 40 CFR Subpart EEEEE Semiannual Certification</p> <p>Facility indicated that there were no start ups, shut downs, or malfunctions inconsistent with the SSM plan. No deviations from emission limits. No periods during with the CPMS was out of control.</p>
03/06/2020	CAM Excursions/Exceedances	Compliance	Facility reported that no CAM Excursion/Exceedance's or monitoring downtime occurred during the reporting period.

Activity Date	Activity Type	Compliance Status	Comments
03/06/2020	NESHAP (Part 61)	Compliance	<p>NESHAPS Subpart Mmmm Semiannual Compliance Certification for 7-1-2019 to 12-31-2019.</p> <p>Facility indicates that no deviations occurred during the reporting period. Facility used compliant coatings and no thinners or cleaners with organic HAPs.</p>
03/06/2020	CEM RATA	Compliance	<p>First quarter cylinder Gas Audit performed by Monitoring Solutions at Asama Coldwater Manufacturing on Feb. 12, 2020. Submittal of this report complies with Appendix 3 Condition No.4.</p> <p>Cylinder Gas Audit (CGA) was performed on 2/12/20 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 2.7% and 1.7% respectively which is below the test requirement (&lt; 15%) allowance under 40 CFR Part 60, Appendix F. An ROP certification report was included with this quarterly report and was signed and dated by the facility's responsible official.</p>
01/30/2020	MACT (Part 63)	Compliance	<p>40 CFR Part 63, Subpart EEEEE: Semi-annual Visible Emissions Observations</p> <p>Certification report appears to have an original dated signature by the facility's responsible official. Report consists of semi-annual visible emission observations conducted on 1/8/2020 which demonstrates compliance with 40 CFR 63.7690(a)(7). No visible emissions were noted during the three hour observation period. Observations were made by an Method 9 certified reader. Certification was included in the report.</p>

Activity Date	Activity Type	Compliance Status	Comments
12/02/2019	CEM RATA	Compliance	<p>2019 Cylinder Gas Audit (4th Quarter)</p> <p>Cylinder Gas Audit (CGA) was performed on 10/25/2019 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 4.41% and 2.80% respectively which is below the test requirement (&lt; 15%) allowance under 40 CFR Part 60, Appendix F. An ROP certification report was included with this quarterly report and was signed and dated by the facility's responsible official.</p>
10/09/2019	Stack Test	Compliance	<p>Relative Accuracy Test on the FG-NEWFOUNDRY EU-MCS Sept 10, 2019</p> <p>Results submitted with an ROP Report certification with original signature and date from the responsible official. The RATA was performed in accordance with 40 CFR Part 60 Appendix B Performance Specification 8 for FIDs. Results of nine 25-minute runs show that the THC CEMS was 1.18% of the emission limit (20 ppm) or 8.40% of the reference method. Relative accuracy needs to be less than 20% of the reference method or 10% of the emission limit. The facility appears to be in compliance with the permit and testing requirements.</p>
09/16/2019	CAM Excursions/Exceedances	Compliance	CAM Certification - No Excursions/Exceedances/Downtime for above period-Reports attached.
09/16/2019	MACT (Part 63)	Compliance	NESHAPS Subpart M MMM Semiannual Compliance Certification for 1-1-201- to 6-30-2019. No deviations occurred.

Activity Date	Activity Type	Compliance Status	Comments
09/16/2019	MACT (Part 63)	Compliance	NESHAPS Subpart EEEE Semiannual Compliance Certification for 1-1-2019 to 6-30-2019. No startup, shut down, or malfunctions occurred. No deviations of emission limitations occurred.
09/16/2019	ROP Semi 1 Cert	Compliance	Facility submitted an ROP semi-annual certification form with original signature and date from responsible official. Facility certifies that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
09/16/2019	ROP Semi 1 Cert	Compliance	Facility submitted an ROP semi-annual certification form with original signature and date from responsible official. Facility certifies that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
09/16/2019	MACT (Part 63)	Compliance	NESHAP Subpart EEEEE Semiannual Compliance Report. Facility reported no startup, shutdowns or malfunctions during the reporting period that required the Startup, Shutdown, and Malfunction Plan to be used. No deviations were reported.

Name: *Amber Cypel*

Date: 9/14/2020

Supervisor:

*RIL 9/23/20*