DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

A579766884

FACILITY: COOPER STANDARD AUTOMOTIVE		**SRN / ID:** A5797
LOCATION: 594 ALPINE RD, GAYLORD		**DISTRICT:** Cadillac
CITY: GAYLORD		**COUNTY:** OTSEGO
CONTACT: Will Hicks , Health, Safety, & Enviornmental Manager		**ACTIVITY DATE:** 03/28/2023
STAFF: Rob Dickman	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Scheduled inspection of this opt out source		
RESOLVED COMPLAINTS:		

I performed an inspection at this facility per the conditions of Permit to Install Number 62-90C. Bill Hicks, EH&S Manager and Kevin Walters, Regional EH&S Manager, accompanied me on the inspection. This facility extrudes and assembles trim for the automotive industry. Both green and cured rubber are used in this process. Adhesive is applied to assemble various parts.

At the time of the inspection, various required records were reviewed. I requested copies of these records from the facility. These records are included with this report.

Following are the findings of this inspection.

EUCLEANUP

This emission unit has not been used since approximately 2004. Mr. Hicks indicated the facility has not used this equipment in the last 12 months.

FG-ExtLines

This group consists of three rubber extrusion lines (1, 2, and 4) followed by adhesive coating lines and three natural gas fired curing ovens.

The VOC emissions from the coating application portion of this group are limited to 26.1 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. Compliance with this limit is demonstrated through recordkeeping and emissions calculations. The most recent calculations performed by the facility as of February of 2023 indicate VOC emissions from the coating application processes were 10.44 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.

The VOC emissions from the rubber extrusion and hot air cure portion of this group are limited to 6.3 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. Compliance with this limit is demonstrated through recordkeeping and emissions calculations. The most recent calculations performed by the facility as of February of 2023 indicate VOC emissions from the coating application processes were 5.2 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.

VOC content of the coatings used in the coating application portion of this group are limited to 4.5 pounds of VOC per gallon of coating, minus water, as applied. These values are obtained through manufacturer certified EPA and SARA information sheets.
The facility uses two different coatings (which are actually adhesives); Flocklock 835A and Flocklock 550P. The facility uses these materials as supplied. A review of coating manufacturers data for these coatings demonstrated the 835A material contained 4.22 pounds of VOC per gallon of coating, minus water, as applied and the 550P material contained 2.59 pounds of VOC per gallon of coating, minus water, as applied. Material usage for coatings and rubber is tracked through monthly purchasing records. These records were available for review. There is no limit on coating usage.

Rubber usage is limited to 6,500,000 pounds of rubber per 12-month rolling time period as determined at the end of each calendar month. Records supplied by the facility indicate usage of 467,740 pounds of rubber as of February of 2023, based on a 12-month rolling time period.

All waste coatings generated at this line are to be collected and stored in closed containers to minimize fugitive VOC emissions. Upon inspection, it was noted that they are. Additionally, the disposal of sponge and wipe applicators is to be done in a manner that would minimize emissions. The facility manifests these as waste along with waste coatings and they are disposed of by an appropriate contractor.

Chemical composition of each coating is kept through SDS information. This information was available for review.

The facility keeps the following information for the coating portion of this group:

- Gallons of each coating used per month. The highest usage in the last 12 months was in August of 2022 at 550 gallons of 835A and 385 gallons of 550P.
- VOC content of each coating as applied.
- VOC emissions calculated monthly and annually on a 12-month rolling basis. The highest calculated VOC emissions in the last 12 months was in August of 2022 at 3927 pounds. As of February of 2023, VOC emissions were calculated at 10.44 tons per year based on a 12-month rolling time period.

The facility keeps the following information for the rubber extrusion and cure portion of this group:

- Pounds of rubber processed per month. This highest monthly amount process in the last 12 months was in September of 2022 at 26,858 pounds.
- VOC emissions calculated monthly and annually on a 12-month rolling basis. This highest monthly VOC emission in the last 12 months was in August of 2022 at 0.55 tons. As of February 2023, VOC emissions were 5.2 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.

Inspection of the stacks associated with this group indicated that they appeared compliant with minimum height and maximum diameter restrictions listed in their permit and they to do not appear to have been recently modified.

FG-Molds

This group consists of 2 rubber production mold processes. There are no specific emission limitations on this group, rather, emissions are limited by material restrictions. Specifically, the facility can process no more than 260,000 pounds of rubber through this group per 12-month rolling time period as determined at the end of each calendar month. Usage of this is tracked through purchasing records. A review of these records a review of records indicates the facility processed 25,642 pounds of rubber in the last 12 months as of February 2023.

FG-FACILITY

The Hazardous Air Pollutant (HAP) emissions from the facility are limited to 9.0 tons per year for each individual HAP and 22.5 tons per year of aggregate HAPs both based on a 12-month rolling time period as determined at the end of each calendar month. Calculations performed by the facility indicate all HAP emissions from the facility in the last 12 months were 8.3 tons as of February of 2023 when combining adhesive coating and extrusion emissions.

Compliance with these emission limits is through emissions calculations based on material HAP content and usage. HAP values used in the emissions calculations are obtained through manufacturer certified EPA and SARA information sheets. Material usage for this coating is tracked through monthly purchasing records. These records were available for review.

The facility keeps the following information for the coating portion of this group:

- Gallons of HAP containing material used per month. This consists of the adhesives used and is tracked monthly and on a 12-month rolling time period.
- Any gallons reclaimed. There is no reclamation at this facility
- HAP emissions calculated monthly and annually on a 12-month rolling basis.

This inspection indicates the facility appears in compliance with their air permitting. No further action is recommended.

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