DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

| FACILITY: Sekisui Voltek LLC. | | SRN / ID: B8786 |
|--|-------------------------------|---------------------------|
| LOCATION: 17 ALLEN AVE., COLDWATER | | DISTRICT: Kalamazoo |
| CITY: COLDWATER | | COUNTY: BRANCH |
| CONTACT: Don Ostrander , Maintenance Dept. Manager | | ACTIVITY DATE: 06/12/2018 |
| STAFF: Dennis Dunlap | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR |
| SUBJECT: Scheduled Inspec | ion | |
| RESOLVED COMPLAINTS: | | |

This was not an announced inspection. Don Ostrander was the contact person. Dennis Dunlap was the inspector for AQD. The inspection began at about 9:30 AM and ended at about 11:30 AM. They are covered by ROP # MI-ROP-B8786-2014b.

FGPARTICULATE

D979644609

This consists of plastic resin storage silos, plastic grinding mills, blenders, and extrusion machines. All this equipment is exempt by Rule 286(2)(a). On the south side of the facility are 10 plastic resin storage silos. The plastic consists of polyethylene and polypropylene beads. Two of the silos are new. The plastic is brought in by railcar or trucks and pneumatically conveyed to the silos. When the silos are being loaded a visible emission check is required. A form for the visible emission check is housed near the silos in a building. The last entry was 6/8/18. The silos were not being loaded during the inspection. A plastic shipment is received about every two weeks. There are two silos on the north side of the facility. These are loaded from the same loading equipment as with the south silos.

Plastic for the 6 single screw-type extruder machines is conveyed from the silos to the mill room. There are 5 milling machines controlled by a sleeve-type of dust collector that emits inside the mill room. After grinding the plastic is conveyed to one of 7 storage tanks located in the mill room. From the storage tanks the plastic is conveyed to blenders where colorant and azodicarbonamide (azo) is mixed into the plastic before going to the extruder machines. The extruder machines produce sheets of plastic that is wound up in rolls. The 5 twin screw-type extruder machines receive plastic directly from the silos. The plastic is mixed with colorant and azo at each machine. The extruder machines are exempt by Rule 286 (2)(a).

There are two cross-link machines. These shoot a beam of electrons across the plastic produced by the extruder machines. The plastic is unrolled and fed into the machines. One is for the twin screw-type extruders and the other is for the single screw-type extruders since they are in different parts of the facility. The electrons are produced from 1.5 million volts. The electrons cause the plastic polymers to form chains when heated in the ovens. This process may be exempt by Rule 286(2)(d).

In Appendix 3 of the ROP they have a semi-annual and annual maintenance schedule for the mills. The last semi-annual maintenance was done on 10/1/17. The next one is due on 4/1/18. It is scheduled but it has not been done yet. They do all the maintenance semi-annually.

FGRULE 290 EUCLEANINGOVEN

This is the Xalox cleaning oven. It is used to clean the raker plates from the extruder machines. A log of the hours is kept. Based on the hours of operation emission factors are used to calculate VOC and particulate emissions. In MAERS both VOC and particulate emissions are being done. At the facility only VOC emissions were found. They are going to check to make sure particulate emissions are being kept at the facility.

FGOVENS

There are 11 natural gas-fired vertical ovens controlled by catalytic oxidizers used to expand extruded plastic into foam. Oven 1 may be removed. They have been issued permit 21-18 to install ovens 13 and 14, but this permit may need to be modified because they may do something different. Oven 11 is undergoing trial operation for installation of a pre-heater authorized by permit 164-16. They will send a letter when this activity is complete.

A walk through of the oven area was done. Oven 8 was operating. On the screen the catalyst inlet temp. was reading 860 degrees F, and catalyst outlet temp, was reading 896 degrees F. Oven 9 was reading 790 degrees for the catalyst inlet temp., and 881 for cat out. Oven 10 cat. in was 891, and cat. out was 881. Oven 5 was reading 925 for cat. in and 916 for cat out. Oven 4 was reading 791 for both cat. and cat. out. Oven 2 was reading 856 for cat. in and 792 for cat. out. Oven 3 was not operating.

They are keeping monthly records on the amount of foam produced per month. They have had no temperature alarms on the oven for catalytic oxidizer temp. They can adjust the fan speeds on the oven to prevent fugitive emissions. Ovens 5, 8, and 10 were tested for non-methane organic compounds and ammonia emissions on October 24 and 25, 2017. They were in compliance.

FGOVEN12

This a natural gas-fired horizontal oven also used to expand plastic into foam. It does not have a catalytic oxidizer. It is used to produce a thicker foam with more uniform cell structure. It has a natural gas-fired belt burner to remove foam build-up on the belt. The oven has its own gas meter. They are keeping VOC emission calculations on a 12-month rolling time period. Azodiacarbonamide usage is also kept on a 12-month rolling time period. This amount was running about 6.35 tons per year. The permit limit is 478 tons per year. They are keeping natural gas usage on a monthly basis. They are going to begin to keep this on a 12-month rolling time period.

FGCOLDCLEANERS

A cold cleaner was seen in the maintenance dept. The lid was closed.

MISCELANEOUS

They have a lamination machine to put layers of plastic foam together by heat. About 8-10% of foam gets laminated. This would be exempt under Rule 286(2)(d). They also have an extrusion coating machine. This puts a plastic coating on finished foam. This process is exempt by Rule 286(2)(a).

NAME Denni Dunlap

DATE 7/25/18 SUPERVISOR MQ 7/26/2018