

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N079335267

FACILITY: GOUGEON BROTHERS INC		SRN / ID: N0793
LOCATION: 100 PATTERSON AVE, BAY CITY		DISTRICT: Saginaw Bay
CITY: BAY CITY		COUNTY: BAY
CONTACT: Glenn House , Director of Product Safety & Regulatory Compliance		ACTIVITY DATE: 06/22/2016
STAFF: Gina McCann	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled inspection to determine compliance with PTIs 759-93, 758-93, 757-93 and 754-93.		
RESOLVED COMPLAINTS:		

I (glm) conducted a targeted inspection of Gougeon Brothers. I met with Mr. Glenn House, Director of Product Safety & Regulatory Compliance.

Gougeon Brother, Inc. formulates and manufactures WEST SYSTEM and PRO-SET mare-grade epoxies used around the world in boat building and boat repair. The facility operates under four active permits and are a true minor source of VOC and particulate. They are located on the Saginaw River and have been open since 1969.

PTI 754-93: Compliant

This PTI is for the main epoxy resin and coating formulation process at the facility housed on the west end of the building. One side is the hardener or curing agent side and the other is resin. This area consists of the mixing of various material in large totes (250 gal) or drums (55 gallon) and is vented. There is a small production line for filling containers for retail sale.

The permit limits the VOC content (Epichlorohydrin) from the resin process to be below 5.0 parts per million by volume (ppmv). In a follow up email, dated June 22, 2016, Mr. House attached a specification sheet for the raw resin that they purchase from Olin Blue Cube Operations LLC. The Certificate of Analysis specifies that the Epichlorohydrin content is below 5ppm. In fact their upper limit is 5 ppm, and most batches come in a <1ppm.

Additionally, the PTI requires a written log of the hours of operation. The facility operates one shift Monday through Friday from 7:00 a.m. to 3:30p.m.

PTI 757-93: Compliant

Moving east through the facility from the epoxy resin emission unit is where the G-5 adhesive emission unit is located. This emission unit consists of one resin mix tank and one hardner mix tank, both 100 gallons. The raw materials for each process are added to the tank then dispensed to smaller packaging for retail sale.

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Monthly records of solvent usage is required and a copy is attached. Additionally, the PTI requires a written log of the hours of operation. The facility operates one shift Monday through Friday from 7:00 a.m. to 3:30p.m.

PTI 759-93: Compliant

The epoxy filler process is located on the northeast end of the facility. This process is primarily mixing and repackaging of amorphous colloidal silica and cotton micro-fibers into smaller packaging for sale and is used as a thickening agent with resin. This emission unit is vented to a barehouse for control. At

the time of the inspection the magnehelic read 0.8 "W.C. Attached to the gauge is a scale which shows proper operating ranges and when the cartridges should be replaced. The appropriate range is 0.25 "W.C.-1.5 "W.C.

The particulate is collected in a 55 gallon drum and landfilled. I viewed the area where the baghouse was located at it appeared to be in good working order. In an email dated June 22, 2016, Mr. house said the drum is inspected every two weeks when the Operators rotate workstations and is emptied approximately every two months.

PTI 758-93: Compliant

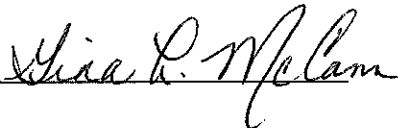
This PTI is for miscellaneous cleanup materials. The facility utilizes a lacquer thinner, benzyl alcohol and denatured alcohol. According to previous staff reports, the PTI was evaluated for methylene chloride and perchloroethylene in the solvent cleanup. The materials have been replace with RST-5 (an emulsifier/surfactant) and bensyzl alcohol. The facility is limited to 0.5 ton per year and to maintain monthly records. Attached are the appropriate records.

Miscellaneous

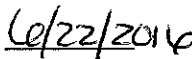
During the inspection Mr. House discussed changing ventilation. The facility had a paint booth at one point, which is no longer installed, and instead was replaced by an employee break room. The facility plans to remove ventilation to the break room and other areas of the plant where it is no longer needed. It appeared the change would be exempt from permitting. The facility calculates emissions based off of mass balance. Mr. House was sent an exemption booklet to determine the appropriate exemption to use.

The facility was in compliance during the inspection.

NAME



DATE



SUPERVISOR

