

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> 8/24/2020	<b>FCE Completion Date :</b> 8/24/2022
<b>Comments :</b>	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
06/23/2022	On-site Inspection	Compliance	
04/27/2022	MAERS	Compliance	<p>ROP Cert report for MAERS and SCT spreadsheet submittal to InfoMAERS</p> <p>The facility submitted a MAERS and SCT certification on an ROP Certification form. The form is signed and dated by the responsible official.</p>
03/21/2022	ROP Annual Cert	Compliance	<p>The facility submitted an ROP certification form with an original signature and date. During the period, the facility was in compliance with all terms and conditions in the ROP except for the deviations reported. The facility reports that on July 6, 2021 the EU-DSCOOLSHAK plant air system stopped operating and the dust collector and RTO shutdown and was restarted. This happened after the holiday shutdown and the system needed to be restarted. Staff observed during the restart. The CEMS continued to operate and VOC never exceeded 9 ppm (limit 20 ppm). No opacity was observed.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/21/2022	ROP SEMI 2 CERT	Compliance	The facility submitted an ROP certification form with an original signature and date. During the period, the facility was in compliance with all terms and conditions in the ROP except for the deviations reported. The facility reports that on July 6, 2021 the EU-DSCOOLSHAK plant air system stopped operating and the dust collector and RTO shutdown and was restarted. This happened after the holiday shutdown and the system needed to be restarted. Staff observed during the restart. The CEMS continued to operate and VOC never exceeded 9 ppm (limit 20 ppm). No opacity was observed.
03/21/2022	MACT (Part 63)	Compliance	Iron & Steel Foundry NESHAPS Subpart EEEEE Semiannual Certification. The facility reported that a shut down of the plant compressor air caused issues with the RTO and dust collector. A deviation was reported and actions consistent with the MAP were taken. There were no deviations reported of emissions limits and there were no periods during which the CPMS was out of control.
03/21/2022	CAM Excursions/Exceedances	Compliance	CAM Excursion/Exceedance and Monitor Downtime Reports; 3rd and 4th Quarters 2021. The facility reports that there was 1 hour of downtime due to monitor and equipment malfunctions. 4 hours of downtime is attributed to QA/QC calibrations, and 15 hours for vendor services or CGA for a total of 20 hours of downtime or 1.43% of total operational time.
03/21/2022	NESHAP (Part 61)	Compliance	Surface Coating Misc Metal NESHAPS Subpart MMMM Semiannual Compliance Certification. The facility states they are continuing to use compliant material options for coating per 40 CFR 63.3891(1)(a). No thinners or cleaners were used that contained organic HAPs and there were no deviations from any emission limits.

Activity Date	Activity Type	Compliance Status	Comments
01/25/2022	Excess Emissions (CEM)	Compliance	Visible Emissions Observation study in accordance with EPA Reference Method 9. In compliance with ROP MI-ROP-N5814-2021 and 40 CFR part 63, subpart EEEEE. Facility sent an ROP certification form with the report with an original signature and date. Facility reports that all visible emissions readings were 0% opacity.
01/25/2022	ROP Other	Compliance	Fourth Quarter Cylinder Gas Audit performed by Monitoring Solutions at Asama Coldwater Manufacturing on Nov. 23, 2021. Submittal of this report complies with Appendix 3 condition No. 4. The facility submitted an ROP certification form that is signed and dated with an original signature. The parameter was THC with a low gas error of 7.18% and mid gas error of 2.13%. Both results are passing.
01/25/2022	Excess Emissions (CEM)	Compliance	Excess Emission Report for Fourth Quarter of 2021 (Oct. 1 - Dec. 31, 2021) The facility submitted an ROP certification form with original signature and date. The facility reported 19 hours of total downtime. Equipment malfunctions totaled 2 hours, QA/QC calibrations were 4 hours, and Vendor services were 13 hours. Total downtime was 1.41% of run time.
11/24/2021	Excess Emissions (CEM)	Compliance	Excess Emission Report for Third Quarter of 2021 (Jul.1 - Sept. 30, 2021)  The facility submitted an ROP certification form with original signature and date. Facility reported a total CEMs downtown of 20 hours, 15 of which were for vendor service and CGA. This totaled 1.43% downtime during periods the plant was operational.

Activity Date	Activity Type	Compliance Status	Comments
10/22/2021	CEM RATA	Compliance	<p>Relative Accuracy Test on the CEM on RTO in FG-DSFOUNDRY EU-DSCOOLSHAK on Sept 14, 2021 (previously identified as FG-NEWFOUNDRY and EU-MCS-S1 in past ROP).</p> <p>The facility submitted an ROP certification form with original signature and date. The facility reported that the relative accuracy was 1.11% of the emission limit (20 ppm as Hexane) or 7.02% of the reference monitor. This shows compliance with the RATA requirements.</p>
09/29/2021	ROP Semi 1 Cert	Compliance	<p>The facility submitted an ROP certification form with original signature and date of responsible official. The facility reported deviations on the report but it appears they were acknowledging the compliant material is being used for MMMM and there were 11 hours of CEMs downtime, mainly due to staff error. No violation notices will be sent based on the reported CEMs deviation.</p>
09/29/2021	CAM Excursions/Exceedances	Compliance	<p>CAM Excursion/Exceedance and Monitor Downtime Reports.</p> <p>The facility reported a total of 11 hours of downtime for the CEMs and that no exceedances occurred during this reporting period. The downtime occurred due to staff error and a malfunction in which the CEMs was recalibrated.</p>
09/29/2021	MACT (Part 63)	Compliance	<p>Surface Coating Misc Metal NESHAPS subpart MMMM Semiannual Compliance Certification.</p> <p>The facility reports that they continue to use MMMM compliance material option for coating, per the NESHAP. No thinners or cleaners were used that contain organic HAPs. No deviations from emission limits occurred during the reporting period.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/22/2021	MACT (Part 63)	Compliance	<p>Iron &amp; Steel Foundry NESHAPS Subpart EEEE Semiannual Certification.</p> <p>The facility reports that there were no start-up, shutdown, or malfunctions during the reporting period. There were also no deviations from emission limits. There was a 2 hour downtime of the CEMs in which the CEMs was subsequently recalibrated.</p>
09/14/2021	Stack Test Observation	Compliance	
08/23/2021	CEM RATA	Compliance	<p>Third Quarter Cylinder Gas Audit performed by Monitoring Solutions at Asama Coldwater Manufacturing on March 17, 2021. Submittal of this report complies with Appendix 3 Condition No. 4. The facility reported a THC low gas error of 2.56 and a mid gas error of 1.37. Both of these number indicate a passing result.</p>
08/23/2021	Excess Emissions (CEM)	Compliance	<p>Excess Emission Report for First Quarter of 2021 (Jan. 1-March 31, 2021)</p> <p>The facility submitted a signed and dated ROP certification form. The facility reported 30 hours of downtime, 13 hours for QAC calibrations and 15 hours for vendor service and the CGA. Two hours were reported for malfunctions. Total downtime was 1.79% of total hours.</p>
08/20/2021	Excess Emissions (CEM)	Compliance	<p>Excess Emissions Report for Second Quarter of 2021 (April 1-June 30, 2021)</p> <p>ACM reports that during the second quarter, the facility had total CEM downtime of 2.19% or 32 total hours. Production time was a total of 1464 hours. Downtime was attributed to span calibrations, routine service outages, and one staff error resulting in 8 hours of downtime.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/20/2021	ROP Other	Compliance	<p>Facility submitted a second quarter CGA for the CEMs. Facility shows that the low gas error was 1.54 and the mid gas error was 0.53. Both readings passed.</p> <p>The facility also submitted an ROP certification form with original signature and date.</p>
08/16/2021	MACT (Part 63)	Compliance	<p>Visible Emissions Observation study in accordance with EPA Reference Method 9. In compliance with ROP MI-ROP-N5814-2006 and 40 CFR part 63, subpart EEEE. The facility reported all readings as zero percent opacity.</p>
04/14/2021	MAERS	Compliance	<p>Facility submitted an ROP certification form with an original signature and date. This certifies their 2020 MAERS emission for MI-ROP-N5814-2015 for Section 1. This was uploaded to MAERS by the Department.</p>
04/13/2021	MAERS	Compliance	<p>Facility submitted their MAERS emissions to be uploaded by the District.</p>
04/13/2021	MACT (Part 63)	Compliance	<p>40 CFR Part 63 Subpart EEEEE Iron and Steel MACT. Facility submitted an ROP Certification with original signature and date. The facility certifies that there were no start up, shutdown, or malfunctions, deviations from emission limitations, periods where the CPMS was out of control, and no deviations during the reporting period.</p>
04/13/2021	ROP Annual Cert	Compliance	<p>Facility submitted a signed ROP certification form with original signature and date. Facility reports that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or other terms or conditions occurred.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/13/2021	ROP SEMI 2 CERT	Compliance	Facility submitted a signed ROP certification form with original signature and date. Facility reports that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or other terms or conditions occurred.
04/13/2021	MACT (Part 63)	Compliance	40 CFR Part 63 Subpart M for Misc. Metal Coating. Facility submitted an ROP Certification with an original signature and date. The facility states it uses the compliant materials option for coating. No thinners or cleaners were used that contained organic HAPs.
04/13/2021	CAM Excursions/Exceedances	Compliance	Facility submitted a signed ROP certification form with original signature and date. Facility reports that during the entire reporting period, there were no deviations, excess emissions, or downtime incidents of the CEMS.
02/12/2021	Excess Emissions (CEM)		Facility submitted the semi-annual excess emission report for Oct. 1 2020 - Dec. 31 2020 on an ROP certification form with an original signature from the responsible official.  The facility reported there were 0 excess emissions during the time of the reporting. There were 7 hours of QA calibrations and 16 hours of other known causes. These known causes were the quarterly vendor services and one hour of "no sample available" for a total of 23 hours of downtime. This equals 1.41% of total CEMs run time.
01/20/2021	MACT (Part 63)	Compliance	Semi-annual MACT Visible Emissions Observations - June 25, 2020: Report states all readings were zero percent opacity.

Activity Date	Activity Type	Compliance Status	Comments
01/20/2021	Excess Emissions (CEM)	Compliance	Visible Emissions Observation. Study in accordance with EPA Reference Method 9. In compliance with ROP MI-ROP-N5814-2006 and 40 CFR part 63, subpart EEEEE.  Facility reports no visible emissions were observed during the observation period.
12/17/2020	ROP Tech Review Notes		
12/14/2020	Excess Emissions (CEM)	Compliance	Fourth Quarter Cylinder Gas Audit performed by Monitoring Solutions at Asama Coldwater Manufacturing on Nov. 04, 2020. Submittal of this report complies with Appendix 3 Condition No. 4.  Reported results show that the facility passed the low gas with an error of 2.21 and a mid-gas error of 0.97. This was submitted with a signed and dated ROP certification form.
12/14/2020	CEM RATA	Compliance	Facility submitted RATA results for FG-NEWFOUNDRY for EU-MCS done on September 10, 2020. Results showed the relative accuracy was 0.86% of the emission limit (20 PPM as hexane) or 5.93% of the RM.
12/11/2020	ROP Semi 1 Cert	Compliance	The facility submitted the report with a signed and dated ROP certification form. Facility reported two deviations during this time period. One reported deviation is just a confirmation the facility is using compliant materials for 40 CFR Part 63 Subpart MMMM. The other deviation is on the CAM for EU-MPS. There was reported downtime in violation of the CAM requirements which was reported in the CAM Monitor Downtime report.
12/11/2020	MACT (Part 63)	Compliance	Iron & Steel Foundry MACT Subpart EEEEE Semiannual Certification  Facility submitted the signed and dated ROP Reporting Certification. The facility reports the CEMs malfunction and was reported in the CAM downtime report. No other deviations from the MACT EEEEE occurred.

Activity Date	Activity Type	Compliance Status	Comments
12/11/2020	CAM monitor downtime	Compliance	CAM Excursion/Exceedance and Monitor Downtime Reports  The facility reports 57 hours of CEMs downtime. The CEMs was not restarted when the RTO was started after returning from the Christmas break. Facility implemented a checklist to confirm proper operation of all components including CEMS.
12/11/2020	MACT (Part 63)	Compliance	Surface Coating Misc Metal NESHAPS Subpart M MMM Semiannual Compliance Certification  The facility identifies they use compliant materials to comply with 40 CFR Part 63 Subpart M MMM. This is reported on the deviation form with the signed and dated ROP compliance reporting form.
12/11/2020	CEM RATA	Compliance	Third Quarter Cylinder Gas Audit performed by Monitoring Solutions at Asama Coldwater Manufacturing on Sept 9, 2020. Submittal of this report complies with Appendix 3 Condition No. 4.  Facility reports that THC gas was 1.96 for low gas error and 0.12 for mid gas error which is passing.
12/11/2020	Excess Emissions (CEM)	Compliance	Excess Emission Report for 3rd Quarter 2020. Facility submitted a signed and dated ROP Certification form. The facility reported no excess emissions. The facility reports 47 hours of CEMs downtime due to malfunction. There was a total of 56 hours total of CEMs downtime or 3.6% of the total.
10/28/2020	ROP Annual Cert	Compliance	Facility reports that during the entire reporting period, the source was in compliance with all terms and conditions contained in the ROP.- AC 10/28/20
10/28/2020	ROP SEMI 2 CERT	Compliance	Facility reports 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. - AC 10/28/20

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10/28/2020	MACT (Part 63)	Compliance	NESHAP Subpart EEEEE Semiannual Compliance Report  Facility reports they are in compliance with all requirements contained in the NESHAP Subpart EEEEE.
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	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.  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.  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.

Name: Annelle Cross Date: 8/24/22

Supervisor: RL 8/25/22