

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

P044750223

FACILITY: CYTEC		SRN / ID: P0447
LOCATION: 3115 MILLER RD, KALAMAZOO		DISTRICT: Kalamazoo
CITY: KALAMAZOO		COUNTY: KALAMAZOO
CONTACT: Matt Uzas , Production Manager		ACTIVITY DATE: 09/06/2019
STAFF: Monica Brothers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

This was an unannounced, scheduled inspection. Staff, Monica Brothers and Rachel Benaway arrived on-site at about 1:15pm and met with Matt Uzas, Production Manager, and Brandon Phillips, HSE Coordinator. We first went into a conference room to discuss some preliminary questions. Cytec began operations around 1940, together with Allnex, as one company. Cytec split from Allnex in 2013, and then Cytec became Solvay in 2015. They still lease space from Allnex, and Allnex still provides Solvay with steam, nitrogen, and methanol. Solvay makes toughening agents for use in composite carbon fiber in the aerospace industry. They are currently operating under the Rule 290 exemption. However, as a result of an EPA inspection conducted in 2015, the facility has been determined to be an opt-out source for HAPs. The company will be submitting an opt-out PTI application within the next few months. The facility has about 18 employees, who work three shifts per day, five days per week, with occasional overtime on the weekends when needed. They do not have any boilers since Allnex provides their steam, they have one generator, and no parts washers. They also have chillers that are used to cool condensers.

Solvay makes three types of solid products: KM-177, KM-180 and 180p, and APC-2. The KM products are polyether sulfone and the APC-2 is a polyether ether ketone. Both the KM-180p and the APC-2 products are in powder form. The others are do not get finely milled. KM-180 and KM0180p are essentially the same product, except in different forms. The production process consists of the reaction, extrusion, coarse milling, washing, drying, and then fine milling for APC-2 and KM-180p. The raw materials that are used are methanol from Allnex, acetone, potassium carbonate, DPS, and DCDPS. Since they do not yet have an opt-out permit, I took a look at their Rule 290 records, which are attached to this report. They show that the facility is under the 500 lbs/month limit for their methanol and acetone emissions.

After our initial conversation, we went on a tour of the facility. We first went to the emergency generator. It is a Cummins 250 HP diesel engine that was manufactured in 2013. The non-resettable hour meter read 278 hours, and it is maintained by Cummins once every six months. It is run for 30 minutes per week for testing purposes and has an EPA certification sticker. It powers a low-level ventilation system and some area lighting fixtures.

The facility has two scrubbers and two dust collectors for controlling the particulate from the powder products. They have two Donaldson Torits, one with six cartridges and the other with four cartridges. Jeff Shina, the Maintenance Coordinator, said that the dust collector for the dryer deck pulls the dirty air through the system and therefore has a negative differential pressure, while the other dust collector for the weigh-up room pushes the dirty air and has a positive differential pressure. During the inspection the dryer deck unit was reading -0.89 inches of water, and the weigh-up unit was reading 1.03 inches of water. Jeff said that they will investigate a unit if it is above 2 inches of water for the weigh-up room, or below -2 inches of water for the dryer deck. They keep daily records of the pressure differential readings. Jeff said that they will replace the cartridges after four cleanings. The areas around the dust collectors looked clean. We also observed the two scrubbers. They were reading 2.5 gpm and 2.1 gpm at the time of the inspection.

We thanked Jeff, Matt, and Brandon for their time and left the facility at about 4:20 pm. The facility seemed to be in compliance at the time of inspection.

NAME 

DATE 9/20/19

SUPERVISOR RIL 9/30/19