

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> WOODBRIDGE FOAM CORP	<b>SRN :</b> M4492
<b>Location :</b> 15573 OAKWOOD DR	<b>District :</b> Detroit
	<b>County :</b> WAYNE
<b>City :</b> ROMULUS <b>State:</b> MI <b>Zip Code :</b> 48174	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> SM OPT OUT	<b>Staff :</b> C. Nazaret Sandoval
<b>FCE Begin Date :</b> 6/1/2017	<b>FCE Completion Date :</b> 6/30/2018
<b>Comments :</b> FCE for FY 2018	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
06/19/2018	MAERS	Compliance	UPDATE: A revised 2017 MAERS report was re-submitted by Woodbridge on 6/15/2018. AQD reviewed the report and passed the audit on 6/19/2018
06/13/2018	Scheduled Inspection	Compliance	Scheduled Inspection for FY 2018

Activity Date	Activity Type	Compliance Status	Comments
06/08/2018	MAERS	Unknown	<p>Record Entry Date: 6/8/2018  The 2017 MAERS report was timely submitted online on 3/9/2018. The report was reviewed and audited during the month of May. VOC total emissions for year 2017 were lower than in 2016 because the RTO, which was installed and operating since August 2016, is controlling the VOC emissions from the Mold Release Agent used in the Foam Molding Process. However, during the audit, AQD found some calculation errors and we failed the report. The VOC emission calculations should have considered the percentage of VOC in the chemicals. In addition, the portion of the emissions that are not capture (2%) by the RTO should be added to the total VOC remissions reported.</p> <p>The report was released to the facility for the appropriate revisions. The compliance status is marked as "Unknown" (on 6/8/2018). AQD will be updating the status once the facility re-submits the revised report on the MAERS database.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/27/2018	CO/CJ	Compliance	<p>First quarterly report of 2018, postmarked 4/27/2018. The report was timely submitted in compliance with the "Recordkeeping and Reporting" requirements of Consent Order AQD No. 31-2013, Section 9.B.1. Woodbridge has been operating under PTI 126-99B approved by AQD on 4/3/16 for the installation of a RTO. The RTO has been used continuously since August 1, 2016. The MRA and VOC limits under the new PTI have changed and the tracking report format was modified by Woodbridge to meet the new PTI reporting requirements.</p> <p>The 12-month-rolling VOC emissions at the end of January, February, and March were reported to be 5.70, 5.66, and 5.68 tons respectively. Monthly VOC emissions for the cited months were 0.61, 0.43, and 0.54 tons. All values are below permit limits. The rest of the ACO requirements ( i.e. consumption reports and MRA emission tracking) are included in the report and they were found to be in compliance with the terms of the ACO control program.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/01/2018	CO/CJ	Compliance	<p>Forth quarterly report of 2017, postmarked 2/1/2018. The report was timely submitted in compliance with the "Recordkeeping and Reporting" requirements of Consent Order AQD No. 31-2013, Section 9.B.1. Woodbridge has been operating under a new PTI (PTI 126-99B) approved by AQD on 4/3/16 for the installation of a RTO. The RTO has been used continuously since August 1, 2016. The MRA and VOC limits under the new PTI have changed and the tracking report format was modified by Woodbridge to meet the new PTI reporting requirements.</p> <p>The 12-month-rolling VOC emissions at the end of October, November, and December were reported to be 5.45, 5.45, and 5.53 tons respectively. Monthly VOC emissions for the cited months were 0.71, 0.46, and 0.43 tons. All values are below permit limits. The rest of the ACO requirements ( i.e. consumption reports and MRA emission tracking) are included in the report and they were found to be in compliance with the terms of the ACO control program.</p>

Activity Date	Activity Type	Compliance Status	Comments
10/20/2017	CO/CJ	Compliance	<p>Third quarterly report of 2017, postmarked 10/20/2017. The report was timely submitted in compliance with the "Recordkeeping and Reporting" requirements of Consent Order AQD No. 31-2013, Section 9.B.1. Woodbridge has been operating under a new PTI (PTI 126-99B) approved by AQD on 4/3/16 for the installation of a RTO. After a period of trial the RTO has been used continuously since August 1, 2016. The MRA and VOC limits under the new PTI have changed and the tracking report format was modified by Woodbridge to meet the new PTI reporting requirements.</p> <p>This is the first period since the installation of the RTO that the facility has enough data to calculate a 12-month rolling VOC (operating period from 08/2016 to 08/2017). The 12-month-rolling VOC emissions at the end of July, August and September were reported to be 5.27, 5.40, and 5.25 tons respectively. The estimated monthly VOC emissions for the cited months were 0.20, 0.55, and 0.31 tons. All values are below permit limits. The rest of the ACO requirements ( i.e. consumption reports and MRA emission tracking) are included in the report and they were found to be in compliance with the terms of the ACO control program.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/02/2017	CO/CJ	Compliance	<p>Second quarterly report of 2017, postmarked 7/28/2017. The report was timely submitted in compliance with the "Recordkeeping and Reporting" requirements of Consent Order AQD No. 31-2013, Section 9.B.1. Woodbridge has been operating under a new PTI (PTI 126-99B) approved by AQD on 4/3/16 for the installation of a RTO. After a period of trial that ended on July 29 of 2016, the RTO has been used continuously. The MRA and VOC limits under the new PTI have changed and the tracking report format was modified by Woodbridge to meet the new PTI reporting requirements. As of the date of the quarterly report, there are not enough data to calculate a 12 rolling VOC for analysis. However, monthly VOC emissions for April, May and June were reported to be 0.45, 0.46 and 0.50 tons respectively ( below permit limits) . The rest of the ACO requirements ( i.e. consumption reports and MRA emission tracking) are included in the report and they were found to be in compliance with the terms of the ACO control program.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/12/2017	Stack Test	Compliance	<p>RTO exhaust stack test results for the verification of the capture efficiency and VOC destruction efficiency. The report summarizes the stack test results for the test conducted on 1/18/2017.</p> <p>The report prepared by the testing company is dated February 16, 2017; however, due to an oversight from Woodbridge, AQD did not receive the report until 6/12/2017 (via email). A hard copy will follow.</p> <p>AQD evaluated the test results and the facility is considered in compliance with the permit requirements. For review details, refer to the TPU analysis provided by Tom Maza .</p> <p>***** ***** **</p> <p>Hard copy of the report was received by AQD on Jun 19, 2017</p>

Name: Chandoral Date: 9/5/2018 Supervisor: JK