

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> Rex Lane
<b>FCE Begin Date :</b> 6/22/2017	<b>FCE Completion Date :</b> 6/22/2018
<b>Comments :</b> ACM/GCI FCE Report	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
06/14/2018	ROP SEMI 2 CERT	Compliance	GCI Facility reports compliance with all ROP terms and conditions during the reporting period.
06/14/2018	ROP Annual Cert	Compliance	GCI Report states that facility was in compliance with all ROP terms and conditions during the reporting period.
06/14/2018	MACT (Part 63)	Compliance	GCI - 40 CFR Part 63, Subpart EEEEE Semi-annual Compliance Report  Report states that there were no startups, shutdowns or malfunctions during the reporting period. The report also states that there were no deviations from the operating parameters established in the OMM plan or instances where the CPMS system was not in full operation during the reporting period.
06/06/2018	Self Initiated Inspection	Compliance	ACM Inspection
06/06/2018	Self Initiated Inspection	Compliance	GCI Inspection: MI-ROP-N5814-2015 (Section Two)

Activity Date	Activity Type	Compliance Status	Comments
05/25/2018	CEM RATA	Compliance	<p>2018 Cylinder Gas Audit (2nd Quarter): EU-MCS-S1</p> <p>Cylinder Gas Audit (CGA) was performed on 5/2/18 using two audit gases (Hexane - required by 40 CFR Part 63, Subpart EEEEE) of known concentration at 20 - 30% and 50 - 60% of system span. Cylinder gas certification sheets were provided with the report. CGA error for the low-level and mid-level spans were 4.90% and 3.04% respectively which is below the test requirement (&lt; 15%) allowance under 40 CFR Part 60, Appendix F. An ROP certification report was included with this quarterly report and was signed and dated by the facility's responsible official. -RIL</p>
04/12/2018	ROP SEMI 2 CERT	Compliance	<p>Second Semi-annual ROP Certification Report - ACM</p> <p>The report contains an original dated signature by the facility's responsible official. The report indicates that there were no deviations from ROP terms and conditions during the reporting period. -RIL</p>
04/12/2018	ROP Annual Cert	Compliance	<p>Annual ROP Certification Report - ACM</p> <p>The report contains an original dated signature by the facility's responsible official. The report indicates that there were no deviations from ROP terms and conditions during the reporting period. -RIL</p>
04/12/2018	CAM Excursions/Exceedances	Compliance	<p>CAM Excursion/Exceedances and Monitor Downtime Incident Summary Report:</p> <p>Report certification contains an original dated signature for the facility's responsible official. The form had incorrect reporting dates so staff contacted facility and revised certification form was received on 4/2/18. The original attached forms indicate that there were no exceedances/excursions or monitor downtime incidents during calendar year 2017. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
04/12/2018	MACT (Part 63)	Compliance	<p>40 CFR Part 63; Subparts EEEEE and MMMM: Semi-annual Compliance Reports</p> <p>MACT Subpart EEEEE semi-annual compliance report contains an original dated signature by the facility's responsible official. Staff discovered upon review that the facility had incorrect reporting dates for the MACT reports and contacted the facility to submit a revised report. The revised report was received on 4/2/18. The original report indicates that there were no startup, shutdown or malfunction events that were inconsistent with their SSM plan; no deviations from any emission limitations or work practice standards and no periods where continuous monitoring systems were out of control during the reporting period.</p> <p>MACT, Subpart MMMM: Facility included a deviation report for Subpart MMMM that is actually a compliance notification report for the reporting period that indicates the facility complied with the compliant material option for coatings under 40 CFR 63.3891 (a). The report further states that no thinners or cleaners were used that contained organic HAPs during the reporting period. -RIL</p>
03/29/2018	MAERS	Compliance	MAERS ROP Certification Report - Gokoh Coldwater Inc.

Activity Date	Activity Type	Compliance Status	Comments
03/16/2018	CEM RATA	Compliance	<p>2018 Cylinder Gas Audit (1st Quarter): EU-MCS-S1</p> <p>Cylinder Gas Audit (CGA) was performed on 2/28/18 using two audit gases (Hexane - required by 40 CFR Part 63, Subpart EEEEE) of known concentration at 20 - 30% and 50 - 60% of system span. Cylinder gas certification sheets were provided with the report. CGA error for the low-level and mid-level spans were 2.70% and 2.43% respectively which is below the test requirement (&lt; 15%) allowance under 40 CFR Part 60, Appendix F. An ROP certification report was included with this quarterly report and was signed and dated by the facility's responsible official. -RIL</p>
02/12/2018	MACT (Part 63)	Compliance	<p>40 CFR Part 63, Subpart EEEEE: Semi-annual Visible Emissions Observations</p> <p>ROP certification report appears to have an original dated signature by the facility's responsible official. Enclosed with the ROP report were the results of semi-annual visible emission observations conducted on 1/30/18 which demonstrates compliance with 40 CFR 63.7690(a)(7). No visible emissions were noted during the three hour observation period. Observations were made by an Method 9 certified reader. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
12/20/2017	CEM RATA	Compliance	<p>2017 Cylinder Gas Audit (4th Quarter): EU-MCS-S1</p> <p>Cylinder Gas Audit (CGA) was performed on 11/21/17 using two audit gases (Hexane - required by 40 CFR Part 63, Subpart EEEEE) of known concentration at 20 - 30% and 50 - 60% of system span. Cylinder gas certification sheets were provided with the report. CGA error for the low-level and mid-level spans were 2.91% and 8.96% respectively which is below the test requirement (&lt; 15%) allowance under 40 CFR Part 60, Appendix F. An ROP certification report was included with this quarterly report and was signed and dated by the facility's responsible official. -RIL</p>
11/16/2017	Telephone Notes	Compliance	<p>OSHA's Crystalline Silica Indoor Air Rule</p>
10/18/2017	ROP Semi 1 Cert	Compliance	<p>Gokoh Coldwater Inc. ROP SEMI 1 Certification</p> <p>Certification report was received late and has an original dated signature by someone who meets the requirements to sign as the responsible official. The report states that there were no deviation during the reporting period. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
10/18/2017	MACT (Part 63)	Compliance	<p>MACT Subpart EEEEE Semi-annual Compliance Report (Gokoh Coldwater Inc.)</p> <p>Report contains an original dated signature by the facility's responsible official. The facility reports that there were no startups, shutdowns or malfunctions during the reporting period that required implementation of the facility's SSM plan. The report also states that there were no instances during the period when the continuous parameter monitoring system was not in full operation while the core making process was operating and there were no deviations from the operating parameters established in the O&amp;M plan during this reporting period. The report also includes a semi-annual visible emissions observation report for opacity readings done on 10/27/16. No visible emissions were observed from the exhaust stacks for the cold box core machines during the observation period. -RIL</p>
10/18/2017	CEM RATA	Compliance	<p>ACM: RATA Test on EU-MCS</p> <p>RATA test report included an ROP certification report signed by the facility's responsible official. The RATA was conducted on 9/14/17 and the test report states that the relative accuracy was 4.07% of the reference method. The method requires the relative accuracy of the CEMS shall be no greater than 20% of the mean value of the reference method test data or 10% of the applicable standard, whichever is greater. - RIL</p>
10/02/2017	Other	Compliance	USEPA led inspection
09/14/2017	CEMS Test Observation	Compliance	EU-MCS: RATA Test

Activity Date	Activity Type	Compliance Status	Comments
09/01/2017	ROP Semi 1 Cert	Compliance	<p>ROP Semi-annual Certification Report:</p> <p>ROP certification report contains an original dated signature by the facility's responsible official. The facility report states that there were no deviations from ROP terms and conditions during the reporting period. -RIL</p>
09/01/2017	CAM Excursions/Exceedances	Compliance	<p>CAM Certification Report</p> <p>ROP certification report contains an original dated signature by the facility's responsible official. The facility reports that there were no CAM monitor downtime incidents or CAM excursions or exceedances during the reporting period. RIL</p>
09/01/2017	MACT (Part 63)	Compliance	<p>MACT, Subpart MMMM</p> <p>ROP certification report contains an original dated signature by the facility's responsible official. The report indicates that there were no deviations from MACT, Subpart MMMM requirements during the reporting period. -RIL</p>
09/01/2017	MACT (Part 63)	Compliance	<p>MACT Subpart EEEEE</p> <p>ROP certification report contains an original dated signature by the facility's responsible official. The report states that during the reporting period there were no SSM events that were inconsistent with the SSM plan; no deviations from any emission limitations, work practice standards or operation and maintenance requirements; and no period during which the CMPMS was out-of-control. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
08/18/2017	MACT (Part 63)	Compliance	<p>40 CFR Part 63, Subpart EEEEE: Semi-annual Visible Emissions Observations</p> <p>ROP certification report appears to have an original dated signature by the facility's responsible official. Enclosed with the ROP report were the results of semi-annual visible emission observations conducted on 8/3/17 which demonstrates compliance with 40 CFR 63.7690(a)(7). No visible emissions were noted during the three hour observation period. Observations were made by an Method 9 certified reader. -RIL</p>
08/10/2017	CEM RATA	Compliance	<p>2017 Cylinder Gas Audit (3rd Quarter): EU-MCS-S1</p> <p>Cylinder Gas Audit (CGA) was performed on 07/25/17 using two audit gases (Hexane - required by 40 CFR Part 63, Subpart EEEEE) of known concentration at 20 - 30% and 50 - 60% of system span. Cylinder gas certification sheets were provided with the report. CGA error for the low-level and mid-level spans were 4.23% and 11.24% respectively which is below the test requirement (&lt; 15%) allowance under 40 CFR Part 60, Appendix F. An ROP certification report was included with this quarterly report and was signed and dated by the facility's responsible official. -RIL</p>

Name: RIL

Date: 6/22/18

Supervisor: MA 6/25/2018