

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

Facility : PLASAN CARBON COMPOSITES		SRN : P0374
Location : 3195 WILSON DRIVE		District : Grand Rapids
		County : KENT
City : WALKER	State: MI Zip Code : 49534	Compliance Status : Compliance
Source Class : MAJOR	Staff : Kaitlyn DeVries	
FCE Begin Date : 6/6/2017	FCE Completion Date :	6/5/2018
Comments : FY 2018 FCE		

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
05/23/2018	Scheduled Inspection	Compliance	The purpose of this inspection was to determine compliance with MI-ROP-P0374-2017, consent order AQD15-2016, and all other applicable air quality rules and regulations.
05/11/2018	MAERS	Compliance	ROP Certification form for MAERS received 3-15-18: The facility used MAERS emission factors for their boilers and emergency engines, otherwise the facility calculated out the emissions as detailed in the supporting documentation. While the facility didn't put a CE in for RGPAIN, the facility uses a RTO with a 96.9% CE, as verified during their last stack test in 2017. The emission factor calculated by the facility accounts for the CE, therefore no changes were made to the report. Additionally, due to the installation of the RTO, there were changes in the emissions compared to last year, but this was expected.

Activity Date	Activity Type	Compliance Status	Comments
03/01/2018	MACT (Part 63)	Non Compliance	<p>The Semiannual Compliance report pursuant to 40 CFR Part 63 Subpart PPPP was first received on 1/25/2018, however no certification form was included. The certification form was received on 2/22/2018, making it complete. In the future, this report should be submitted by September 15. AQD will not send a Violation Notice for the late submittal since this requirement is still fairly new to the facility. AQD will tell the Plasan Carbon Composites (PCC) representative that they must submit in a timely manner, moving forward. PCC chose to use the emission with add-on controls option to show compliance. The facility used the volume weighted averaging of HAP contents for all products after considering the reduction in emissions after add-on controls to demonstrate compliance with the HAP content limit. EU-PAINTLINE-1 uses a RTO for control, while EUPAINTLINE-2, EU-SPOTPRIME, and EU-ADHESIVE are all uncontrolled, but are part of FG-PPPP, which includes the MACT conditions. The highest monthly HAP (lb)/Solids (lb) was 0.0161 in March 2017, with a 12-month rolling quantity of 0.0118, at the end of the reporting period.</p>

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03/01/2018	MACT (Part 63)	Compliance	<p>The Semiannual Compliance report pursuant to 40 CFR Part 63 Subpart PPPP was first received on 1/25/2018, however no certification form was included. The certification form was received on 2/22/2018, making it complete. Plasan Carbon Composites (PCC) chose to use the emission with add-on controls option to show compliance. The facility used the volume weighted averaging of HAP contents for all products after considering the reduction in emissions after add-on controls to demonstrate compliance with the HAP content limit. EU-PAINTLINE-1 uses a RTO for control, while EU-PAINTLINE-2, EU-SPOTPRIME, and EU-ADHESIVE are all uncontrolled, but are part of FG-PPPP, which includes the MACT conditions. The highest monthly HAP (lb)/Solids (lb) was 0.0434 in December 2017, with a 12-month rolling quantity of 0.0152.</p>
02/28/2018	ROP Annual Cert	Compliance	<p>The Annual Certification report pursuant to MI-ROP-P0374-2017 for Section 1 was received on time and complete. The ROP was initially issued on June 30, 2017 therefore the reporting period does not encompass a complete year. No deviations were reported. No further action is necessary.</p>
02/28/2018	ROP Annual Cert	Compliance	<p>The Annual Certification report pursuant to MI-ROP-P0374-2017 for section 2 was received on time and complete. The ROP was initially issued on June 30, 2017 therefore the reporting period does not encompass a complete year. No deviations were reported. No further action is necessary.</p>
02/28/2018	ROP SEMI 2 CERT	Compliance	<p>The Semi-Annual Certification report pursuant to MI-ROP-P0374-2017 for Section 1 was received on time and complete. No deviations were reported. No further action is necessary.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/28/2018	ROP SEMI 2 CERT	Compliance	The Semi-Annual Certification report pursuant to MI-ROP-P0374-2017 for section 2 was received on time and complete. No deviations were reported. No further action is necessary.
02/28/2018	CAM Excursions/Exceedances	Compliance	The required CAM semi-annual Excursion/Exceedance pursuant to MI-ROP-P0374-2017 was received on time and complete. No excursions or exceedances were reported for the reporting period. No further action is necessary.
02/28/2018	CAM monitor downtime	Compliance	The required CAM Monitor downtime report pursuant to MI-ROP-P0374-2017 was received on time and complete. No downtime was reported for the reporting period. No further action is necessary.
10/03/2017	ROP Semi 1 Cert	Compliance	This report was received late, but complete. This is the first Semi-Annual report due under MI-ROP-P0374 issued on June 30, 2017 for Section 2. No deviations were reported for the one (1) day reporting period, therefore no Violation Notice will be sent for the late submittal. Plasan should, however, report that as a deviation during the next reporting period.
10/03/2017	ROP Semi 1 Cert	Compliance	This is the resubmittal of the semi-annual report for section 1 due under MI-ROP-P0374 issued on June 30, 2017. The report was originally submitted on 9/13/17, but resubmitted to include the CAM requirements and Section 2. Since the CAM reports were not included in the on-time submittal. No deviations were reported for the reporting period. Plasan should, however, report that as a Deviation in the next Semi-annual report and the Annual Report.

Activity Date	Activity Type	Compliance Status	Comments
10/03/2017	CAM Excursions/Exceedances	Compliance	This report was received late, but complete. This is the first CAM excursion report due under MI-ROP-P0374 issued on June 30, 2017. No excursions or exceedances were reported for the reporting period of one (1) day. Therefore, no Violation Notice will be sent for the late submittal. Plasan should, however, report that as a deviation during the next reporting period.
10/03/2017	CAM monitor downtime	Compliance	This report was received late, but complete. This is the first CAM monitor downtime report due under MI-ROP-P0374 issued on June 30, 2017. No CAM monitor downtime was reported, for the reporting period of one (1) day. Therefore, no Violation Notice will be sent for the late submittal. Plasan should, however, report that as a deviation during the next reporting period.

Name: Karlyn D'Amico Date: 6/5/2018

Supervisor: 