



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
New England Regional Laboratory
Laboratory Services and Applied Science Division
11 Technology Drive, North Chelmsford, MA 01863

Report Memorandum

Drafted Date: 9/22/21

Finalized Date: 9/29/21

Subject: Pretest Observation Report – Trelleborg Coated Systems US, Inc.

From: William Osbahr, Stack Testing Coordinator, Field Services Branch (FSB) /WAO/
Alysha Murphy, Stack Testing Coordinator (Trainee), FSB /ADM/
Tyler Kotsifas, Stack Testing Coordinator (Trainee), FSB /TLK/

Through: Jerry Keefe, Team Leader, FSB /JCK/

To: Christine Sansevero, Chief, Air Compliance Section
Enforcement and Compliance Assurance Division

Facility Information:

A. Facility Name: Trelleborg Coated Systems US, Inc.
B. Facility Location: 30 Lenox St., New Haven, CT 06513
C. Facility Contact: Brian Franco, General Manager
D. ICIS-Air #: CT0000000900903003

Background Information:

A. Date of inspection: September 9, 2021
B. US EPA Representative(s): William Osbahr, Alysha Murphy, Tyler Kotsifas
C. Inspection Purpose: Pretest Meeting for proposed emission testing and Coating Line Enclosure Monitoring Inspection for ECAD

Disclaimer:

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Observation Notes:**Inspection Participants:**

Name	Title	Organization
William Osbahr	Stack Testing Coordinator	USEPA
Alysha Murphy	Environmental Scientist	USEPA
Tyler Kotsifas	Environmental Scientist	USEPA
Brian Franco	Plant Manager	Trelleborg
David Moore	Maintenance Manager	Trelleborg
Eric Turner	EH&S Manager	Trelleborg
Jose Rivera	Production Manager	Trelleborg
Mike Kelley	Stack Test Company - Owner	CK Environmental
Brendan Kelley	Stack Test Representative	CK Environmental

EPA representatives Mr. Osbahr, Ms. Murphy, and Mr. Kotsifas (EPA Team) performed a pretest/monitoring inspection of Trelleborg Coated Systems US, Inc. - New Haven Facility (Trelleborg). The EPA Team arrived at Trelleborg at 8:15 and left at approximately 12:00.

Opening Conference:

The EPA Team conducted an opening interview with the Trelleborg and their consulting staff listed above. Mr. Osbahr, Ms. Murphy, and Mr. Kotsifas showed their credentials to Mr. Franco and Mr. Turner. They explained that the purpose of the inspection was to assess the modifications which Trelleborg executed on enclosures for Coating Lines 1, 2, 3, 4, 8 and 10.

Facility Tour:

During the tour, the EPA Team utilized a Flame Ionization Detector (FID), a hot wire anemometer (HWA), and a smoke tube to assess the enclosures for adherence to the requirements under Method 204. Method 204 describes the characteristics and standards that a coating line must meet in order to be considered a Permanent Total Enclosure (PTE). The focus of this monitoring inspection was to:

1. Measure the delta P of the enclosure and compare the data to the .007 iwc requirement in Method 204.
2. Measure NDO inlet velocity and compare data to 200 fpm requirements of Method 204.
3. Utilize smoke tube gun to verify that all NDOs had inward directional flow, as required by Method 204.
4. Measure background VOC concentrations for safety purposes. Note: Background concentrations remained below 27 ppm throughout the facility except for the area with an open drum. An instantaneous spike of 127 ppm was detected. It was an isolated event where a coating drum was opened instantaneously.

The EPA Team assessed coating lines 1, 2, 3, 4, 8 and 10. Results of the assessment are outlined below.

Coating Line	NDO Velocity (fpm) <i>Must Exceed 200 fpm</i>	Delta P <i>Must Exceed .007 (iwc)</i>	NDO Flow Direction <i>Must be Inward to NDO</i>	Meet M204 Criteria? At time of monitoring?
1	250-326	.022	Inward	Yes
2	113-237	.006	Inconsistent or not Inward	No
3 and 4	Units down due to fan Outage. Not monitored For M204	Unknown	Unknown	Unknown
8	796	.055	Inward	Yes
10	387	.013	Inward	Yes

Mr. Osbahr reviewed the above assessment with Mr. Franco and Mr. Turner and stated he would submit his initial observation report to Trelleborg. Inspector Osbahr conveyed that observation that Coating Line 2 had extremely low inlet velocities at the enclosure area. Mr. Osbahr also explained that the oven slot area had slightly higher values, but the overall coating enclosure clearly did not meet Method 204 requirements.

Trelleborg operates a REECO Regenerative Thermal Oxidizer (RTO) to destroy captured VOC emissions. The EPA Team toured the RTO and its control room.

Closing Conference:

Inspector Osbahr explained that Coating Line 2 did not demonstrate the required characteristics of Method 204. Mr. Franco and Mr. Turner said they would review operational status of Coating Line 2. Mr. Franco stated that Trelleborg would perform the needed repairs of Coating Lines 3 and 4 and have CK perform a Method 204 study. He stated that they would perform necessary improvements to the enclosures on Lines 2,3,4 such that they can meet Method 204 requirements.

Mr. Osbahr stated that Trelleborg should review the 114 Reporting Requirement dates and make sure that they adhere to the timelines required for this test.

The EPA Team departed the facility at approximately 12:00 pm.