



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: 12/05/2021

Finalized Date: 12/17/2021

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

From: William Osbahr, Stack Testing Coordinator, Field Services Branch (FSB) /WAO/
Tyler Kotsifas, Environmental Scientist, 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
- B. Facility Location: 30 Lenox Street, New Haven, CT 06513
- C. Facility Contact: Brian Franco, General Manager
- D. ICIS-Air #: CT0000000900903003

Background Information

- A. Date of test: 12/2/21
- B. US EPA Representative: William Osbahr, Jerry Keefe, Tyler Kotsifas

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

Investigation Participants:

Name	Title	Organization
William Osbahr	Stack Testing Coordinator	US EPA
Tyler Kotsifas	Environmental Scientist	US EPA
Jerry Keefe	Environmental Engineer	US EPA
Mike Kelley	Stack Tester	CK Environmental
Chris Durante	Stack Tester	CK Environmental
Nick Garber	Stack Tester	CK Environmental
Brendan Kelley	Stack Tester	CK Environmental
Brian Franco	Plant Manager	Trelleborg
Eric Turner	EH&S Manager	Trelleborg
David Moore	Maintenance Manager	Trelleborg
Wesley Badorek	Maintenance Manager	Trelleborg

EPA representatives Mr. Osbahr, Mr. Kotsifas, and Mr. Keefe (EPA Team) attended a Volatile Organic Compounds (VOC) Capture Efficiency (CE) and Destruction Efficiency (DE) test at Trelleborg Coated Systems US, Inc. (Trelleborg) on December 2, 2021.

The EPA team arrived at 8:00 am and met with Mr. Turner.

Opening conference:

The EPA Team held a brief opening conference to discuss the day's testing plan. The EPA Team stated that the purpose was to observe CE/DE testing activities which were expected to be performed throughout the day. Mr. Turner had explained in a phone call to EPA Team on the afternoon of December 1, 2021, that the facility was having difficulty meeting 100% CE with more than 2 enclosures in operation. In response to this deficiency, Mr. Turner explained that Trelleborg would only conduct low load operations while performing DE testing. Trelleborg would only operate 2 coating machines during the testing. Coaters 1 and 4 were chosen since they were the only coaters that Trelleborg could attempt to meet Method 204 criteria with.

Observations:

Before testing began, the EPA Team went up to the flat roof of the facility to see if all bypass vents which EPA had documented to be leaking during its previous visit of October 28, 2021, had been properly closed off. The EPA Team witnessed the work that had been done on the subject bypass vents. Each of the bypass vents cited on October 28, 2021, had been closed, capped, and sealed off in with sheet metal components.

Mr. Moore stated further that the exhaust stack on the side of the building designated as M8 is used to remove and vent hot room air and not oven VOC laden air. This was a question that was also brought up during the previous visit.

After assessing the bypass vents, Mr. Franco, Mr. Turner and the EPA Team agreed that a low load test should commence. Coaters #1 and #4 were run throughout the day to achieve low level conditions in order for CK Environmental to perform DE testing..

The first test run took place from 10:05 AM -11:05 AM. A series of FLIR videos were recorded by EPA during the first test run that demonstrated the main bypass stack connected to the oxidizer's ventilation was leaking uncontrolled VOC emissions to the environment. Screenshots from these FLIR videos can be found in Attachment A of this report. FLIR videos clearly demonstrating emissions will be retained by the EPA team and will be available upon request.

The second test run took place from 11:28 AM-12:28 PM. The third run took place from 12:53 PM-1:53 PM.

Closing Conference:

The EPA Team held a closing conference with Mr. Franco, Mr. Turner, Mr. Moore, and Mr. Kelley to discuss the results of the testing. The EPA Team explained that the FLIR videos demonstrated VOC fugitive/uncontrolled emissions from the main bypass stack.

Mr. Kelley informed EPA Team of the initial results of the stack test. He summarized that Trelleborg's thermal oxidizer averaged 95.6% DE for the three test runs.

The EPA Team requested that Mr. Turner and Mr. Kelley send copies of all continuous parameter monitoring data and all relevant field data sheets to them.

The EPA Team informed Mr. Turner that they would follow up with them at a further date.

Mr. Osbahr recommended that Trelleborg contact Mr. McCusker and/or Ms. Sansevero of EPA regarding the preliminary results.

EPA representatives Osbahr and Kotsifas left the facility at approximately 2:45 PM, Mr. Keefe departed earlier at 1200 PM.

Attachment A: FLIR Camera Videos

Photo 1: Main Bypass Stack Demonstrating Leaks on Camera's High Sensitivity Mode



Photo 2: Main Bypass Stack Demonstrating Leaks on Camera's Auto Mode



Photo 3: Main Bypass Stack Demonstrating Leaks on Visible Light Mode

