



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: MAR 22 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
A. Schulman Inc.

FROM: Gregory Gehrig, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Chief
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: A. Schulman Inc.

Facility Location: 1301 N. Flora Street, Plymouth, IN

Date of Inspection: March 13 and 15, 2019

EPA Inspectors:

1. Gregory Gehrig, Environmental Engineer
2. Eleanor Kane, Environmental Engineer

Other Attendees:

1. Rick Reynolds, Indiana Department of Environmental Management
2. Karen Ray, Operations Manager, A. Schulman, Inc.

Contact Email Address: karen.ray@schulman.com

Purpose of Inspection: CAA Compliance

Facility Type: Gelcoat manufacturing

Regulations Central to Inspection: SIP, NSPS and MACT

Arrival Time: 1330 hrs on March 13, and 0700 hrs on March 15

Departure Time: 1505 hrs on March 13, and 0755 hrs on March 15

Facility Name: A. Schulman Inc.

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Date of Inspection: March 13 and 15, 2019

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from facility personnel.

Company Ownership: The facility is owned by A. Schulman Inc. The facility has had the same ownership since at least 2014.

Process Description:

The A. Schulman Inc. (A. Schulman) facility makes styrene and resin-based gelcoats for the fiberglass composite manufacturing industry. Raw materials include styrene, unsaturated polyester styrene-based resins, pigments and dyes. Materials are hard-piped to the 3 fixed mixers from outdoor aboveground storage tanks. Material for all mixers is also dispensed from drums. These are mixed in 18 mixers, 3 of which are fixed and vented to a thermal oxidizer (TO) and 15 of which mix for portable tanks. Mixers for portable tanks are vented to the atmosphere. Two roll mills are used to ensure pigments are completely mixed and are also vented to atmosphere. The facility is 'air swept' from floor vents, which are vented to atmosphere. There are air makeup units that provide air into the facility from the ceiling. Plastic sheets, called bonnets, are banded to batches on tanks not currently being mixed or milled. Products are poured into drums and pails, labeled, and warehoused prior to shipping out. Monitors near the floor detect volatile organic compounds (VOCs) for safety purposes.

The facility is subject to NESHAP Subpart HHHHH, the Miscellaneous Coatings MACT (MCM). The facility did not have a leak detection and repair program at the time of the inspection.

TOUR INFORMATION

EPA toured the facility: Yes

The facility was not in operation at the time of the inspection on March 13, 2019, as A. Schulman typically operates from 6 am to 2 pm. All vessels and operations were observed then, however. Tank were covered, but lids on top of both permeant and portable tanks at mixers are not air tight (and lids on portable tanks have vents connected to rooftop openings).

Data Collected and Observations: EPA utilized a FLIR camera to observe process operations on March 15, 2019 and collect images.

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At the time of inspection on March 15, 2019, the facility was operating normally.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

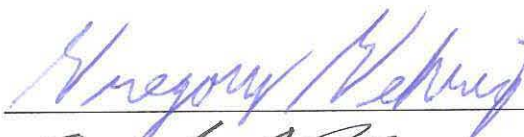
Facility layout (taken).

CLOSING CONFERENCE

Requested documents (to be provided via email):

- Most recent performance test for TO and emission calculations spreadsheet.
- Voluntary environmental audit information.

SIGNATURES

Lead Inspector:  Date: 3-20-2019

Section Chief:  Date: 3/22/19

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DIGITAL IMAGE LOG

1. Photographer: Eleanor Kane, Photos; Gregory Gehrig, FLIR videos	2. Date(s) of Inspection: March 13 and 15, 2019
3. Company/Facility Name: A, Schulman Inc.	4. Street Address, City, State: 1301 N. Flora Street, Plymouth, IN
5. Number of Images: 22	6. Archival Record Location: CD-R labeled A. Schulman Images 3.13 & 15.2019

Image name	Date and Time (EDT)	Description
IMG_0684	March 13, 2019 at 1440	Portable tanks with bonnets
IMG_0685	March 13, 2019 at 1441	Mixer with portable tank
IMG_0686	March 13, 2019 at 1442	Roll mills
IMG_0687	March 13, 2019 at 1443	Ducting to outside from roll mills and mixer with portable tank and others
IMG_0688	March 13, 2019 at 1444	Mix tanks vented to TO
IMG_0689	March 13, 2019 at 1444	Lid of mix tank vented to TO
IMG_0690	March 13, 2019 at 1445	Lid of tank associated with mix tank vented to TO
IMG_0691	March 13, 2019 at 1445	Lid of tanks associated with mix tank vented to TO
IMG_0692	March 13, 2019 at 1446	Baghouse prior to TO
IMG_0693	March 13, 2019 at 1448	Mix tank group routed to TO
IMG_0694	March 13, 2019 at 1448	Lid of tank associated with mix tank vented to TO
IMG_0695	March 13, 2019 at 1448	Lid of mix tank vented to TO
IMG_0696	March 13, 2019 at 1450	VOC (styrene) detector
IMG_0697	March 13, 2019 at 1452	Floor sweep vent
IMG_0698	March 13, 2019 at 1452	VOC (styrene) detector next to floor sweep vent

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IMG_0699	March 13, 2019 at 1453	Portable tank cleaning operation
IMG_0700	March 13, 2019 at 1455	Tank farm
IMG_0701	March 13, 2019 at 1458	Xylene cleaner
IMG_0702	March 13, 2019 at 1500	TO stack
MOV_0024	March 15, 2019 at 0719	Styrene compound added to Mixer 8
MOV_0025	March 15, 2019 at 0736	Mixer 10
MOV_0026	March 15, 2019 at 0739	TO