

**COMPLIANCE INSPECTION FOR AIR QUALITY MANAGEMENT**

Department: ENVIRONMENTAL MONITORING AND ENFORCEMENT DIVISION-WATER AIR QUALITY MONITORING SECTION
(1st QUARTER SMR EVALUATION)

Report Control Number: AIR-QS-08

Date of Inspection: May 18, 2020

Mission Order No.: _____

1. GENERAL INFORMATION		
Name of Establishment: TBK MANUFACTURING CORP.		
Address: HOLLYWOOD, BRGY.74, NULA-TULA, TACLOBAN CITY		Geo Coordinates: 11.24542 124.99966
Nature of Business: Caraggeenan Extraction and Refining		
PSIC Code: 10205	Product: Carrageenan powder	Year Established: 1999
Operating hours/day: 24	Operating days/week: 6	Operating days/year: 312
Product Lines	Production Rate as Declared in the ECC (unit/day)	Actual Production Rate (unit/day)
Caraggeenan Powder	570 MT	1000kg
		65000 kg (1st quarter)
Name of Managing Head:	Mr. Peter Tan	
Name of PCO:	Engr. Jeffrey A. Sinodivilla	
PCO Accreditation No.:	COA NO. 2020-RVIII-0013	Date of Effectivity: January 13, 2020
Phone/Fax:	888-3252/09434036459	Email: jeffrey@tbk.com.ph

2. PURPOSE OF INSPECTION

- ☐ Verify accuracy of information submitted by the establishment pertaining to new permit applications, renewals, or modification

	New	Renewal
<input type="checkbox"/> New Renewal	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> PMPIN Application	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Hazardous Waste ID Registration	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Hazardous Waste Transporter Registration	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Hazardous waste TSD Registration	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Permit to Operate Air Pollution Control Installation	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Discharge Permit	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Others _____	<input type="checkbox"/>	<input type="checkbox"/>

- ☒ Determine compliance status with the environmental regulations, permit conditions, and other requirements

- ☐ Investigate community complaints

- ☐ Check status of voluntary commitment

_____ Industrial Ecowatch

_____ Philippine Environmental Partnership Program (PEPP)

_____ Pollution Adjudication Board (PAB)

_____ Others _____

- ☐ Others _____

Name of Contact Person

Engr. Jeffrey A. Sinodivilla

Position / Designation

Pollution Control Officer

3. COMPLIANCE STATUS

3.1 DENR Permits/Licenses/Clearance

Environmental Law	Permits		Date of Issue	Expiry Date
PD 1586	ECC1	08-000321-0083	03/28/2000	
	ECC2	ECC-R08-1701-0002	01/13/2017	
	ECC3			
RA 6969	DENR Registry ID	GR-R8-37-0061	08/17/2016	
	PCL Compliance Certificate			
	CCO Registry			
	Permit to Transport			
RA 8749	POA No.	POA-2019-E-0837-0144	5/17/2019	5/17/2024
RA 9003	ECC for Sanitary Landfill			
RA 9275	DP No.	DP-R08-19-02546	9/3/2019	9/3/2020

MODULE AQM01: PRE-INSPECTION INFORMATION SHEETFOR EMISSION SOURCES

Emission Source Data Information	
Emission Source No.	1
Type (Brand/Model)	COCOMAX Boiler
Rated Capacity	320 HP
Fuel Type & Quantity	Rice Hulls
Operating Capacity	91%
Control Facility	Cyclone and Scrubber
Notes	

Emission Source Data Information	
Emission Source No.	2
Type (Brand/Model)	THERMAX Boiler
Rated Capacity	5,000 kg/hr (320 HP)
Fuel Type & Quantity	Wood
Operating Capacity	90%
Control Facility	Cyclone and Scrubber
Notes	

Emission Source Data Information	
Emission Source No.	3
Type (Brand/Model)	LINCHARNG Boiler
Rated Capacity	114 HP
Fuel Type & Quantity	BFO
Operating Capacity	50%
Control Facility	Wet Scrubber
Notes	

Emission Source Data Information	
Emission Source No.	4
Type (Brand/Model)	CATERPILLAR Genset
Rated Capacity	160 KW
Fuel Type & Quantity	diesel
Operating Capacity	standby
Control Facility	
Notes	

Legal Provision	Regulatory Requirements	Compliant			Notes
		Y	N	N/A	
DAO 2004-26					
Rule 19 Section 1	All emission sources have a valid Permit to Operate	/			
Rule 19 Section 3	As built design of the installation conforms with submitted engineering plans and specifications	/			
	Declared control facilities are installed and operational	/			
	Installation is located as proposed in the vicinity map (plant and machinery layout)	/			

	Facility design capacity is within the capacity declared in the application for permit to operate	/			
Rule 19 Section 5	Temporary Permit is still valid			/	
Rule 19 Section 6	Application for renewal has been filed for expiring Permit to Operate 30 days before permit expiration date			/	
Rule 19 Section 9	Permit to Operate displayed conspicuously upon the installation or in an accessible / visible place near the installation	/			
	Conditions of the Permit to Operate are complied with	/			
Rule 19 Section 11	Plant operational problems notification submitted to EMB within 24 hours of occurrence			/	
Rule 19 Section 12	Quarterly submission of self-monitoring report	/			3 rd Quarter – October 14, 2019 4 th Quarter – January 7, 2020
DAO 2000-81					
Part 7 Rule 25 Section 5 a# 1	Person in charge of the plant / equipment has sufficient measure to ensure that no dark smoke is discharging from any stack in the establishment. E.g.: window view of stack, mirror to reflect top of stack, smoke density indicator, CCTV, etc.	/			CCTV was installed to monitor the emission at the smokestacks.
Part 7 Rule 25 Section 5 a# 2	All oil-burning equipment have heaters capable of heating oil to a temperature appropriate for the oil and burner	/			
Part 7 Rule 25 Section 5 a# 3	Establishment is fossil fuel-fired power plant over 10MW rating installed with CEMS for particulates, sulfur oxide, and NOx			/	
	Establishment is petroleum refinery / petrochemical industry installed with CEMS for particulates, sulfur oxide, and NOx			/	
	Establishment is primary copper smelter installed with CEMS for particulates, sulfur oxide, and NOx			/	
	Establishment is steel plant installed with CEMS for particulates and sulfur oxide			/	
	Establishment is ferro-alloy production facility installed with CEMS for particulates			/	
	Establishment is cement plant installed with CEMS for particulates			/	
Part 7 Rule 25 Section 5 b	Miscellaneous equipment like reheating furnace, smoke oven, bake oven, coffee heaters, varnish kettles, etc. are installed with pollution control facilities			/	

Part 7 Rule 25 Section 13 a	Establishment has precautionary controls for dusts generated during vehicular movement, transportation of materials, construction, etc. (List controls identified)			/	
Part 7 Rule 25 Section 13 b	Establishment has precautionary controls for volatile organic compounds or organic solvent emissions generated during storing, pumping, handling, processing, etc. (List controls identified)			/	
Part 7 Rule 25 Section 13 d	No open burning activity in the establishment	/			

EMB Memorandum Circulars

MC 2009-04	Standby Gensets with capacity greater than or equal to 1,250 KW undergo annual emission testing (with 3 test runs). These gensets should not have the potential to emit more than 100tons/year of regulated pollutant.			/	
MC 2007-003 (2)	Boiler rated at greater than or equal to 251HP undergo bi-annual emission testing (with 3 test runs)	/			Two (2) units 320 BHp Boilers both Thermax and Cocomax undergone bi-annual emission testing with 3 test runs. Conducted on: May 23-24, 2019 and October 21, 2019
	Other sources that have potential to emit equal to or greater than 100tons/year of regulated pollutant undergo bi-annual emission testing (with 3 test runs)			/	
	Boiler rated between 100 to 250 HP undergo annual emission testing (with 3 test runs)			/	
	Diesel generator rated at 600 to 1,249KW undergo annual testing (with 3 test runs)			/	
	Other sources that have potential to emit greater than 30 but less than 100tons/year of regulated pollutant undergo annual emission testing (with 3 test runs)			/	
	Sources of emissions of hazardous air pollutants included in PCL (DAO 1998 -58) undergo bi-annual emission testing (with 3 test runs)			/	
	Emission sources of petroleum refinery undergo bi-annual emission testing (with 3 test runs)			/	
	Emission sources of petrochemical works undergo bi-annual emission testing (with 3 test runs)			/	

	Emission sources of smelters undergo bi-annual emission testing (with 3 test runs)			/	
	Emission sources of cement kilns undergo bi-annual emission testing (with 3 test runs)			/	
	Emission sources of steel -making plants undergo bi-annual emission testing (with 3 test runs)			/	
	Emission sources of ferro-alloy-making plants undergo bi-annual emission testing (with 3 test runs)			/	
	Emission sources of glass-making plants undergo bi-annual emission testing (with 3 test runs)			/	
	Boiler rated at 99HP or less undergo biennial emission testing (with 3 test runs)			/	
	Diesel generator rated at 599KW or less undergo biennial emission testing (with 3 test runs)		/		No emission testing for one (1) unit 335 Kw Caterpillar Genset.
	Other sources that have potential to emit at least 10tons/year but less than 30tons/year of regulated pollutant undergo biennial emission testing (with 3 test runs)			/	
	Source using Bunker Fuel Oil, blended fuels involving Bunker Fuel Oil, or sulfur content of 1% or more undergo bi-annual emission testing	/			Emission testing for one (1) unit of 114 BHp Lincharng Bunker Boiler was conducted. Conducted on: May 23-24, 2019 and October 21, 2019
Appendix F (Quality Assurance Procedures)					
Section 6 (8)	Notification has been sent to EMB for any changes made in the CEMS installation			/	
	Notification has been sent to EMB for any changes made in the CEMS quality assurance and quality control plan			/	
Section 6 (5)	Each CEMS is audited and conducted in accordance to CFR 40 part 60 Appendix F.			/	

Section 6 (6)	Relative Accuracy Test Audit (RATA) is performed annually by industries in the presence of EMB personnel.			/	
	Establishment has sent thirty (30) day notice to EMB prior to the RATA testing schedule			/	
Section 6 (7)	Calibration gases are subject to audit or relative accuracy audit test every quarter			/	
	Other alternative quarterly audits employed by the establishment are approved by EMB.			/	
Section 6 (9)	EMB Director and Regional Director have been notified of CEMS malfunction that lasted longer than seven (7) consecutive days.			/	
Section 7 (1)	Records of occurrence and duration of any start-up, shut-down or malfunction in the operation of any source or control facility is available in the establishment.			/	
Section 7 (2)	Records of audits, performance testing, evaluations, calibration checks, adjustments and maintenance of any continuous emission monitors that have been installed pursuant to Rule IX Section 5 of DAO 2000-81 are available in the establishment.			/	
Section 8 (1)	SMR includes data on the time intervals, date and magnitude of excess emissions, nature and cause of excess, corrective actions taken, and preventive measures adopted.			/	
Section 8 (2)	SMR includes information on the averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard for the pollutant/source category in question.			/	
Section 8 (3)	SMR includes information on time and date for each period during which the continuous monitoring system was inoperative and the nature of system repairs and adjustments made in the CEMS/COMS			/	
Section 8 (4)	SMR data measurements are within 75% data capture?			/	
For Facilities Engaged with Consent Agreement					

EMS established within 18 months upon entering Consent Agreement with EMB	EMS established within 18 months upon entering Consent Agreement with EMB			/	
DAO 2000-81 Part 7 Rule 25 Section 9b	Environmental Management Plan derived from EMS process submitted within 6 months after entering Consent Agreement with EMB			/	

Other Observations:
<ul style="list-style-type: none">1. Permit to Operate Air (POA-2019-E-0837-0144) was issued on May 17, 2019 valid until May 17, 2024 for the three units boiler and one unit diesel engine generator set.2. 1st quarter SMR was submitted May 8, 2020.3. Results of emission test conducted are within the DENR Standards.
Remarks and Recommendation:
<ul style="list-style-type: none">1. Subject APSE to emission test for CY 2020.2. Submit Test Plan of emission test for approval.3. Maintain compliance to provisions of RA 8749.
List of Documents Reviewed:
ECC, POA, SMR

Submitted by:


JO ANNE JOY M. DAÑAL
Senior EMS

Recommending Approval:


Engr. CARLOS A. CAYANONG
Chief, WAQMS

Approved by:


Engr. REYNALDO B. BARRA, PME
Chief, EMED

Noted by:


LETECIA R. MACEDA
Regional Director