# DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**ACTIVITY REPORT: Scheduled Inspection** 

B160626691  FACILITY: General Motors LLC Flint Assembly		SRN / ID: B1606
LOCATION: G-3100 Van Slyke Rd., FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Irene Bashore , Senior Environmental Engineer		ACTIVITY DATE: 08/28/2014
STAFF: Daniel McGeen COMPLIANCE STATUS: Compliance		SOURCE CLASS: MAJOR
SUBJECT: Partial Compliance Ev	aluation (PCE) activities, conducted as part of a Fu	Il Compliance Evaluation (FCE): 1.) scheduled
inspection; and 2.) review of facility	y recordkeeping.	
RESOLVED COMPLAINTS:		

On 8/28/2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of General Motors LLC Flint Assembly.

#### **Environmental contacts:**

Irene Bashore, Senior Environmental Engineer, General Motors Company; 810-577-9003; irene.bashore@gm.com

Apurva Pujara, Senior Environmental Engineer, RE&F Energy & Environment, General Motors Company; 248-255-7795; apurva.pujara@gm.com

#### Facility description:

This facility is principally involved in the manufacture of light duty trucks. This includes paint shop operations, and final assembly, plus a utility complex. Paint shop emissions of volatile organic compounds (VOCs) are controlled with a regenerative thermal oxidizer.

#### Regulatory overview:

The facility's latest renewal of their ROP, MI-ROP-B1606-2014, is currently in "proposed" status. The facility has an approved Permit to Install (PTI), No. 173-13, to construct a new paint shop, in order to replace the current paint shop.

This facility is considered a major source in regards to Prevention of Significant Deterioration (PSD) (40 CFR 52.21) regulations, because the facility's Potential to Emit (PTE) of VOCs exceeds 250 tons.

This facility is considered to be a major stationary source of Hazardous Air Pollutants (HAPs) because it has the potential to emit a single HAP at 10 tons per year (TPY), and/or aggregate HAPs of more than 25 TPY.

The Primer Surfacer/Top Coat line is subject to Rule 702(A) since this line is considered a new source of VOC emissions. This requires the use of Best Available Control Technology (BACT) for this coating line. The Primer Surfacer emission unit is subject to Subpart MM-Standards of Performance for Automobile and Light-Duty Truck Surface Coating Operations. However, the requirements of this Subpart have been subsumed under stricter requirements in Rule 702(A). Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-duty Truck Topcoat Operations, EPA-450/3-88-018 is applicable to Primer Surfacer/Top Coat line.

This stationary source is subject to the federal Compliance Assurance Monitoring (CAM) rule under Tille 40 of the Code of Federal Regulations (CFR), Part 64, because coating lines have both a control device and potential pre-control emissions of VOCs greater than the major source threshold level. In addition, post control emissions of VOCs from coating lines are over the major source threshold level. CAM requirements are included in this ROP.

#### Fee status:

Because General Motors LLC Flint Assembly is classified as a major source, it pays an annual Category I facility fee, and also pays per ton of pollutants discharged. It annually reports estimated air emissions via the Michigan Air Emissions Reporting System (MAERS).

#### Location:

This facility is bordered on the north by I-69, and on the west by I-75. To the south is an open area of industrial

land that is being turned into the site of the future paint shop for this facility. South of that is General Motors LLC Flint Engine Operations, State Registration Number (SRN) B1607, and to the west is General Motors LLC Flint Metal Center, SRN B1608. There is a residential neighborhood about 250 feet east of Flint Assembly. There is a residential area north of I-69 that is roughly 1,800 feet from Flint Assembly.

#### Recent history:

A third shift was added at the plant August, 2011. The plant runs 5 days per week, with occasional operations on Saturday. The 900 light duty truck line is now called the K2XX line, and sometimes just as "the main line."

The most recent odor complaints received regarding Flint Assembly were one in 2011, and one in 2007. To deal with odor complaints in years before that, a number of changes were made at the plant, including process changes, and continuous improvement items. Flint Assembly has received PTI No. 173-13 for installation and operation of the new paint shop. This will replace the current paint shop at the site, which was installed in 1947. Originally, the future paint shop was to have a large single RTO, but the company has informed AQD recently that smaller, individual RTOs will be installed throughout the plant, as needed. When more details on the proposed changes are known, GM staff will apply to revise the current PTI. The paint shop is estimated to begin operations during the first quarter of 2016.

#### Arrival:

AQD Environmental Engineer Bob Byrnes and I met at the plant at 9:02 AM, this morning. On my way there, I could not detect any odors from the facility, nor see any visible emissions. Weather conditions were sunny, clear, and 60 degrees F, with winds out of the north. While driving north on Van Slyke Road, I had seen that the new paint shop for Flint Assembly was under construction.

After I had viewed the introductory video for this facility, Bob and I met with Ms. Irene Bashore, Senior Environmental Engineer, and with Mr. Apurva Pujara, Senior Environmental Engineer. We provided a copy of the DEQ brochure Environmental Inspections: Rights and Responsibilities. The purpose of today's site visit was to conduct a scheduled inspection, and review facility recordkeeping. Both of these are considered Partial Compliance Evaluation (PCE) activities, part of a Full Compliance Evaluation (FCE). The U.S. Environmental protection Agency Compliance Monitoring Strategy, which the AQD follows, is for 50% of Title V sources to undergo a FCE, each year.

We began the site visit with a pre-inspection meeting, and a review of environmental recordkeeping. Bob had e-mailed to Ms. Bashore a pre-inspection questionnaire, to help make sure that all necessary records would be readily available, during the inspection.

The plant is permitted to produce no more than 49.8 jobs per hour. The month with the highest production rate within the past 12 months was August, 2013, with 28.57 jobs per hour. The month with the lowest production was January 2014, with 11.31 jobs per hour. This was explained to result from the launching of the K2XX line, as a product launch involves refining their tooling, paint process, and build process.

After the review of records, we inspected the paint shop, and then went through the final assembly areas of the facility. Next, we went to the utilities complex, to observe the boilers. We concluded with a post inspection meeting.

It was explained to me that the order of events for manufacturing a vehicle here is to start at the body shop, then go to the cleaning process, ELPO process, sealer process, primer spraybooth, primer oven, topcoat spraybooth, topcoat oven, general assembly, and then final assembly.

# Inspection:

# **Phosphate**

The phosphate system utilizes an all spray system; no dip tanks are used in this process. Steam is provided from the powerhouse to heat the process water and there are no separate boilers for this emission unit. There are 3 products used in the emission unit (body washer, process foam depressor and a rust inhibitor) of which the usages and VOC contents if any are recorded in the Miscellaneous Solvents category. There are no emission limits or permit requirements for this process in the ROP. Copies of the miscellaneous solvent records are attached to this report.

#### EU-11ELPO-S1

The ELPO system consists of the dip tank, cure oven and scuff booth. Vehicle bodies first are cleaned. Then, they are electrostatically given a positive charge, while the coating is negatively charged.

Emissions from the ELPO oven are directed to an exempt RTO which is used for odor control purposes only. There are no permit requirements for the RTO and thus no oxidizer operating parameters were obtained. The oxidizer had its Destruction Efficiency (DE) tested in November 2006 and was at 91.7% DE. Material usages for e-coat are provided by BASF the coating supplier. Usages are determined by inventory and purchase records. Method 24 is performed by the supplier to determine the VOC content. 2 additives are used for flow control. Emissions records were collected and reviewed for the month of July, 2014. Copies of the records are attached to this report. Review of the emission records showed compliance with the respective emission limits for EU-11ELPO-S1:

Actual Emissions – July 2014	Permit Limit
10.58 lbs VOC	71.8 lbs per hour VOC
28.9 tpy VOC	163.8 tons per year VOC, 12 month rolling time period.
0.54 lbs VOC/gallon, minus water	1.2 lbs VOC per gallon, minus water

## **EU-12PRIMERSURF-S1**

This emission unit consists of a solvent borne prime system which sprays white primer under white topcoat and grey primer under all other colors. The primer, or primer surfacer, may also be called a guidecoat. The primer booth begins with overhead bells and side bells, 4 robots with traditional sprayers (2 run, 2 as backup), a primer oven, prime scuff and a manual back up zone. Robotic gun sprayers apply paint to places that the bell robots cannot reach, such as "cut ins."

The floor grates outside of the booth were completely covered in gray paint and very tacky. Apparently the grate flooring is difficult to keep clean. Unlike traditional smooth floors where cleaning machines, protective coatings, or manual cleaning can be utilized to keep the floors clean. The grates need to be removed for proper cleaning. Particulate control is provided by a water wash system, with a down draft pulling particulates into recirculating water.

Material usages for EU-Primer are provided by BASF the coating supplier. Usages are determined by inventory, purchase records and mix room records. Method 24 is performed by the supplier to determine the VOC content. Emissions records were collected and reviewed for the month of July 2014. Review of the emission records from the auto protocol overall summary report for the month of July 2014 showed compliance with the respective emission limits for EU-12PRIMERSURF-S1. A copy of the records are attached to this report.

Actual Emissions - July 2014	Permit Limit
23.4 lbs VOC per hour	82.0 lbs per hour VOC
6.7 Tons VOC	10.6 tons per month VOC
67.0 tpy VOC	118.9 tons per year VOC, 12 month rolling time period.
4.2 lbs VOC per gallon of applied coating solids	9.0 lbs VOC per gallon of applied coating solids

A copy of the auto protocol TE/OSL/CE (Transfer Efficiency/Oven Solvent Loading/Control Efficiency) was obtained, dated 8/18/2014. No significant changes have occurred which would require any retesting. Transfer Efficiency for the Primer Surfacer line was done the week of 8/20/2012, and the resulting value was 79.6%. The most recent oven exhaust control device VOC loading test value was 4.4. The CE for the RTO for the Primer Surfacer and Topcoat current destruction efficiency test value was 96.1% The Destruction Efficiency value used in the updated protocol, as of 7/1/2014, is 97.2%,

# **EU-14TOPCOAT-S1**

This emission unit consists of a solvent borne basecoat and clearcoat system. The Basecoat portion of the topcoat booth begins with 2 door openers, 2 traditional robots, 2 traditional robots, 2 robot bells, 2 robot bells, 4 traditional robots, 2 manual sprayers and a heated flash. The clearcoat portion of the topcoat

system consists of: 2 door openers, 2 traditional robots, 6 traditional robots, 4 bell robots, 2 bell robots, a manual zone and the topcoat oven. Vehicles head to the finesse deck after the topcoat system. Material usages for EU-Topcoat are provided by BASF, the coating supplier. Usages are determined by inventory, purchase records and mix room records. Method 24 is performed by the supplier to determine the VOC content. Emissions records were collected and reviewed for the month of July 2014. Review of the emission records from the auto protocol overall summary report for the month of July 2014 showed compliance with the respective emission limits for EU-14TOPCOAT-S1. A copy of the records obtained is attached to this report.

Actual Emissions – July 2014	Permit Limit
192.0 lbs VOC per hour	479.2 lbs per hour VOC
55.3 Tons VOC	61.9 tons per month VOC
540.6 tpy VOC	708.8 tons per year VOC, 12 month rolling time period.
8.7 lbs VOC per gallon of applied coating solids	12.2 lbs VOC per gallon of applied coating solids

A copy of the auto protocol TE/OSL/CE review dated 8/18/2014 was obtained. No significant changes have occurred which would require any retesting. Previous testing results are as follows: TE was conducted in October 2006 and again in November 2009. The TE values were at 71.7% for metallic gray (base metallic), 74.9% for solid white (base solid) and 82.6% for clear coat during the 2009 testing. The average TE value used for the month of March 2011 was 78.4%. OSL testing was conducted in December 2006 and ranged from 3.53 to 3.69 lbs VOC/GAS. The actual average OSL value for the month of March 2011 was 3.63 lbs VOC/GAS.

For the topcoat oven, the ROP requires that zones 1-3 be controlled by the RTO. In addition to zones 1-3 being exhausted to the RTO, GM voluntarily exhausted zones 4 and 5 to it. Since they did this, odor complaints have virtually ceased. Zones 6 and 7 vent to atmosphere. The vast majority of VOCs are driven off during the first 5 zones of the topcoat oven.

The CE for the RTO for the Primer Surfacer and Topcoat current destruction efficiency test value was 96.1% The Destruction Efficiency value used in the updated protocol, as of 7/1/2014, is 97.2%. On 6/28/2014, JLB Industries, LLC calibrated the RTO's thermocouple, and confirmed the accuracy of the unit, to within 0.5% of the source calibrator.

At approximately 11:25 AM, the RTO was operating at 1451 degrees F, above the minimum 1400 degrees F required by the permit. The set point was 1450 degrees F. The unit was running in 3 tower mode, with all 3 chambers operating. The exhaust outlet temperature varied from 258 to 283 degrees F. The control valve (CV) was at 12%. This supplies natural gas as fuel to the unit. The low value indicates the burner was on low fire, at this time. From the roof of the assembly plant, no visible emissions could be seen. Weather conditions were sunny and clear, and 65-70 degrees F.

## **EU-15SEALADHESIV-S1**

Material usages for EU-SEALADHESIV are provided by PPG the sealer/adhesive supplier. Usages are determined by inventory and purchase records. The GM Materials group also does an inventory and purchase record. Method 24 is performed by the supplier and/or manufacturers data depending on the material to determine the VOC content. Emissions records were collected and reviewed for the month of July 2014 which showed compliance with the respective emission limits for EU-15SEALADHESIVE-S1. Copies of these records are attached to this report. All actual emissions were well below their respective emission limits.

Actual Emissions – July 2014	Permit Limit
6.54 lbs VOC per hour	62.4 lbs per hour VOC
16.7 tons VOC	109 tons per year VOC, 12 month rolling time period.
0.18-0.26 lbs VOC per gallon, minus water (metal parts)	Lbs VOC per gallon limits as described in Rule 621.
0.18-0.26 lbs VOC per gallon, minus water (plastic parts)	Lbs VOC per gallon limits as described in Rule 632.

During the inspection, we observed robotic systems applying white plastisol sealer. The vehicles then went to the sealer room, for work done by hand, like hem-sealing. The sealers get cured in the primer oven, along with the primer surfacer (see EU-12PRIMERSURF-S1).

An 11/1/2011 e-mail indicated that GM Flint Assembly has not used a windshield primer since 2007 when it was

replaced with a gasket.

## **EU-16MISCSOLVENT-S1**

Purge solvents are covered by EU-MISCSOLVENT-S1. Material usages are provided by HAAS chemical manufacturing company from inventory and purchase records. Gage Products takes the spent solvents and provides records of material reclaimed by reporting every for load of waste solvent (% water, % solids). Overall approximately 60% of the purge solvents are reclaimed. Method 24 and/or manufacturer's data are used to determine the VOC content of the materials used. 900 line records were obtained for July 2014. Copies of these records are attached to this report. The month of July was reviewed and the results are shown in the table below. All actual emissions were below their respective emission limits.

Actual Emissions – July 2014	Permit Limit
27.80 lbs VOC per hour	267 lbs per hour VOC
96.1 Tons VOC	800 tons per year VOC, 12 month rolling time period.

July 2014 purge solvent emission calculations in gallons were provided. These show net emissions of GMT900 as 1,517 gallons. During the post-inspection meeting, Bob indicated for the new paint shop, it would be helpful to see how much solids and VOCs were in the solvents shipped out from the facility. GM staff were very cooperative, and indicated that they could begin doing this for the current paint shop, prior to completion of the new paint shop.

#### **EU-18FINALREPAIR-S1**

This emission unit is no longer in use or has been removed as the facility uses the Medium Duty repair area for all repairs made to 900 line vehicles.

#### **EU-MDFINALREPAIR-S1**

The Final Repair Material usages for EU-MDFINALREPAIR are provided by GM employee usage logs kept in the MDFINALREPAIR area. Method 24 is performed by the supplier on the repair materials (Not spray cans/tubes) to determine the VOC content. The VOC content for the small usage spray cans (5 oz) and paint tubes (0.5 oz) are determined using manufacturer's data as there is no way to perform method 24 on a spray can or 0.5 oz dabber tube of paint. Emissions records were collected and reviewed for the month of July 2014 which showed compliance with the respective emission limits for EU-MDFINALREPAIR-S1. Copies of these records are attached to this report. All actual emissions were well below their respective emission limits.

Actual Emissions – July 2014	Permit Limit
0.05 Lbs PM per hour	1.62 lbs PM per hour, Final Repair.
0.08 Tons PM per 12 month rolling time period	4.12 tons PM per 12 month rolling time period, Final Repair.
0.00 Lbs PM per hour	0.32 lbs PM per hour, Spot Repair.
0.00 Tons PM per 12 month rolling time period	0.82 tons PM per 12 month rolling time period, Spot Repair.
0.45 Tons VOC per 12 month rolling time period.	13.9 tons per 12 month rolling time period.
4.3 Lbs VOC per gallon, minus water	4.8 Lbs VOC per gallon, minus water.

# FG-COATLINE#2-S1

The flexible group covers the primer surfacer and topcoat lines of the light duty coating line. Production records were obtained for January through July 2014 (copy attached to this report). The final line jobs per hour ran between 11.3 and 28.2 jobs per hour for the first 7 months of 2014. SC IV.1 limits the line production to no more than 49.8 jobs per hour.

SC IV.2 requires that the regenerative thermal oxidizer be installed and properly maintained on the first three zones of the primer convection oven, the heated flash and the entire clearcoat radiant oven. Information was obtained from Irene Bashore during the inspection to clarify how many zones are in each oven. There are 7 zones in the primer oven and the first 3 zones go to the RTO, the first 2 zones in the oven are for radiant heat and lasts approximately 12 minutes. There are 11 zones in the topcoat oven of which 10 zones go to the RTO

for VOC control.

RTO oxidizer temperature records for today's date, 8/28, were provided by Ms. Bashore by e-mail, pursuant to a request I made the following month. The data, attached to this report, shows that temperatures were above the limit of 1400 degrees Fahrenheit at all times on 8/28, as required in special condition IV.3. The thermocouples for both the high temp limit and the process temperature controller were validated by JLB Industries LLC on 6/28/2014, and, prior to that, on 6/15/2013, which demonstrates compliance with SC VI.6(c). A copy of the oxidizer maintenance records were obtained, from 12/31/2012 through 8/22/2014. Copies of the maintenance checks are attached to this report. The records of maintenance inspections for the thermal oxidizer covers the requirements as found in SC VI.6.

The paint booth water wash system is monitored daily to demonstrate it is working by recording the amperage usage on each of the pumps in the prime booth (3 pumps, 3 in use) the base coat booth (5 pumps, 5 in use) and the topcoat booth (6 pumps, 5 in use). All amperage values were consistent throughout the month of July, 2014. A copy of this report is attached.

## FG-MACT LIGHT DUTY-S1

This flexible group is the conditions for the Auto MACT Subpart IIII. A copy of the MACT summary report was obtained for July 2014, and is attached to this report.

Also attached to this report is the most recent copy of the MACT work practice plan. The work practice plan clearly identifies all requirements under 40 CFR 63.3094(b) & (c) and notes for each item which work practice(s) the facility utilizes. The facility has chosen compliance without add-on controls and does not include E-coat within the calculations. The e-coat materials meet the obligations as required in 63.3092(a) as they contain no HAP > 1% by weight or >0.1% by weight for any carcinogenic HAP. A copy of the E-coat MSDS for the resin, paste and 2 additives are attached to this report. The following HAP emissions were reported for the Month of July, 2014:

Actual Emissions July 2014	MACT Limit
0.24 Lbs HAP/GSA*	1.1 Lbs HAP/GSA*
0.000 Lbs HAP/Lb Material	0.01 Lbs HAP/Lb Material for Sealers and Adhesives.
0.000 Lbs HAP/Lb Material	0.01 Lbs HAP/Lb Material for Deadener.

<sup>\*</sup> GSA = gallons solids applied

## FG-COLDCLEANERS-S1

This flexible group covers all the parts washers at the facility. A comprehensive list of all parts cleaners were obtained during the site inspection and are attached to this report. The facility appears to have a total of 12 cold cleaners. They consider them to be exempt under Rule 281(h), for cold cleaners with an air/vapor interface of not more than 10 square feet. The various cleaners on the list comply with Rule 707(2) & (3) by staying under the freeboard ration and the use of lids. No further review of this information was conducted.

## FG-PAINTBOOTHS-S1

There is only one Rule 287 paint booth which is for maintenance painting only. The spray booth has not been in use for a couple years. There also is a limited supply of painters/skilled trades in house any longer who can do painting. No further information was requested for this flexible group.

## FG-RULE290

An anti-chip sealer is being tracked as EU-ANTI-CHIP, under EU-Rule 290. Records were provided for July, 2014. Emissions were of non-carcinogenic VOCs, emitted at 387.80 lbs per month, less than the 1000 lbs/month allowed by Rule 290 for uncontrolled emissions.

# **EU-GASBOILER7-S2**

The boiler number 7 has a capacity of 198 MMBTU/hr. An example of the record for the steam load in pounds per hour for the month of July, 2014 was obtained at the site inspection. Boiler 7 did not operate during the month of July.

The natural gas boilers at this facility are not subject to NSPS because they were installed in 1945. The boilers were converted from coal to natural gas via PTI No 1024-80 & 1024-80A. This change was not considered a major modification at a PSD source. It was considered a minor modification based upon a determination from EPA which considered the utilization rate was not affected, the emission factors for all relevant pollutants would decrease and there would be no increase in the hours of production or the rate of production. The evaluation form for PTI 1024-80 and 1024-80A also was checked as False for subject to NSPS.

## FG-GASOILBOILER568-S2

The facility currently has 4 boilers at the facility which are operational. Boiler 5 has a capacity of 120 MMBTU/hr, boiler 6 is 100.5 MMBTU/hr, 7 is 198 MMBTU/.hr and boiler 8 is 174 MMBTU/hr.

An example of the record for the steam load in pounds per hour for the month of July, 2014was obtained at the site inspection. Only boiler 6 ran during the month of July. The average steam load was 9,038 lbs/hr for boiler 6. This value is below the permit limit of 80,000 lbs/hr for boiler 6. The lbs/hr steam load is calculated based upon the known fuel usage and the known steam produced. Boiler 6 was in operation during the site inspection on 8/28/2014. It was recently rated for 100.5 mmBtu/hr, rather than the 120 MMBTU/hr which had previously been ascribed to it in the ROP. That rating had actually been determined during the 1940s. The average steam load boiler for 6 on 8/28/2014, the day of the inspection, was 11,000 lbs/hr. The ROP limits it to 80,000 lbs/hr.

As mentioned above, the natural gas boilers at this facility are not subject to NSPS because they were installed in 1945. Also as descried above, the boilers were converted from coal to natural gas, and this change was considered a minor modification at a PSD source.

There are also some decommissioned boilers in the powerhouse, which are no longer capable of operation. These were coal-fired boilers.

#### **Methanol Tank**

This facility does not have a dedicated Methanol storage tank. All windshield solvent materials (Methanol) is delivered and stored in totes. As such, this facility is not subject to the OLD MACT subpart EEEE

# **Liquid Storage Tanks**

A copy of the storage tanks was obtained during the inspection and is attached to this report. The storage tanks range in size from 15,000 to 20,000 gallons. 4 tanks were installed in 1964 and are not subject to Subpart Kb. 10 tanks were installed in 1998, of which 9 are greater than the 19815 gallon size and therefore are subject to NSPS Subpart Kb. 1 tank was installed in 2002 and is also subject to NSPS Subpart Kb. The storage tanks are used to store gasoline, diesel fuel, Ethylene Glycol, Purge Solvent, Automatic Transmission Fluid, power steering fluid, and reclaimed purge solvent.

#### Generators

They have 8 generators onsite, which are not in the old ROP, MI-ROP-B1606-2009. They have been keeping records on the most recent generator hours of run time, even though that is not yet required. Ms. Bashore provided us with copies of monthly emergency generator hour meter readings, attached for reference.

#### MEDIUM DUTY LINE

The 560 medium duty line produced the last medium duty vehicle on July 31, 2009. Since that time the MDFINALREPAIR emission unit has been utilized to repair 900 line vehicles. The 900 repair line has either not been used or has been removed completely. The remainder of the 560 line is still at the facility, no future plans have been announced, but the emission units could still possibly be used in the future. The buildings areas are still minimally heated as required, using heat from the boilers at the stationary source.

# Post-inspection meeting:

Bob commented that it would be helpful to see, for the new paint shop, what amount of solids and VOC are present in their purge manifest records. This is something which GM has tracked in the past, for the existing paint shop, I was informed. GM staff indicated they will start tracking the amount of solids and VOCs in their purge manifest record, even prior to the startup of the new paint shop. It was explained that they are currently far below their permitted limit.

**Conclusion:** 

We could not find any instances of noncompliance, nor any areas of concern. Ms. Bashore, Mr. Pujara, and other General Motors staff were very knowledgeable, helpful, and professional. Their recordkeeping appeared thorough, and the facility was clean, and well organized.

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DATE 1920/2014

SUPERVISOR