DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

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FACILITY: FINISHING TOUCH IN	C	SRN / ID: N2384			
LOCATION: 191 SIMPSON DR, L	ITCHFIELD	DISTRICT: Jackson			
CITY: LITCHFIELD		COUNTY: HILLSDALE			
CONTACT: Tom VanAuken , Own	er	ACTIVITY DATE: 04/18/2017			
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT			
SUBJECT: Scheduled Inspection					
RESOLVED COMPLAINTS:					

Facility Contact: Tom VanAuken, Owner

Phone: 571-542-5581 Email: tvana@acd.net

I arrived at the facility and met with Cory Bevard, plant manager and explained the purpose of my visit. Tom Van Auken, the owner of Finishing Touch, was not in at the time but was expected to return a little later this morning. I then asked Cory if he would show me the paint lines that were permitted under PTI #389-96B. He told me that EU-DIPLINE has been removed from the facility. He then told me that they have changed EU-CHAINONEDGE, which was not operating at the time of the inspection, to be a process that washes the various parts before they are coated. The special conditions for EU-CHAINONEDGE are for the use of coatings and solvents and now are not applicable if this emission unit stays as a parts washing equipment. The only lines that were in use at the time of the inspection were EU-SPRAYLINE, EU-60SPINDLE, and FG-WASHERS. EU-SPRAYLINE is now a powder coating process and they change the filters every day. This emission unit could now be exempt under Rule 287(2)(d). EU-60SPINDLE processes between 5,000 to 7,000 parts daily and all exhaust filters were installed. He informed me that they change the filters twice a day, at the beginning of shift and then at 9am. We then went to FG-WASHERS and he showed me the containers of the detergents and the bonding and rinse sealer that they use in the emission unit. It appeared that neither of these has VOCs in their ingredients so the special conditions of this flexible group are not applicable. He also took me to EU-SINGLESPINDLE, which they do use but was not operating at the time of the inspection. He said that they change the filters every day on that emission unit. Cory then took me to where they store the containers of all waste coatings and filters, which were closed at the time of inspection, waiting to be shipped out.

We then went back to the office and I asked for copies of the MSDS's for the paint that they use the most and for the detergents and bonding and rinse sealer (see attached). I told him that I would review these after I got back to my office. Mr. VanAuken was not expected to be back yet, so I told Cory that I would go do another inspection in the area and return later this morning.

When I returned Mr. VanAuken had already arrived and was waiting for me. I told him of the purpose of my visit and then I requested to see the records that they were required to keep for each line. He showed me the spreadsheet that he keeps with all the daily paint usage and then the monthly paint totals and VOC emissions. Since I recently had audited their MAERS submittal, I determined that they were in compliance with the record keeping requirements of EU-SPRAYLINE, EU-60SPINDLE, and EU-SINGLESPINDLE. However it appeared that they were not maintaining the records of the HAPS and I requested that he talk to his consultant about getting those records up to date. Except for the HAPs recordkeeping that seemed not to be up to date as required in FG-FACILITY Special Condition 8.5 and I still had to review the MSDS's that were provided to me, I told him that I am considering his facility in compliance at this time. I thanked him for his time and left.

I started reviewing the ingredients that were listed in the MSDS's and none were HAPs. The only one that had potential was in the TechKote WA2951FE(B1). Butoxyethanol (CAS #111-76-2) is a glycol ether and glycol ethers are listed as a HAP. However, on November 29, 2004 the EPA delisted butoxyethanol as a HAP. If any of the other materials that they may use are similar to the ones I reviewed, then the reason that they have not been maintaining their HAP records is because none of them contain any. Based on my inspection and their MAERS submittal, I have determined that they are in compliance with their permit.

NAME Bue Carly

DATE 5/10/17

SUPERVISOR_