

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N242263846

FACILITY: PLASTI PAINT INC		SRN / ID: N2422
LOCATION: 801 WOODSIDE DR, SAINT LOUIS		DISTRICT: Lansing
CITY: SAINT LOUIS		COUNTY: GRATIOT
CONTACT: Dave Bacon , President		ACTIVITY DATE: 06/29/2022
STAFF: Julie Brunner	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Compliance inspection of Plasti-Paint, Inc. PTI 568-97D, GPTI 145-19 (non-compliance), and misc. exemptions		
RESOLVED COMPLAINTS:		

On June 29, 2022, I conducted an in person, scheduled inspection of Plasti-Paint, Inc. (N2422) in Saint Louis. The last inspection of this facility was on May 2, 2019.

Facility Contacts:

David Bacon, General Manager, 989-681-5702, dbacon@plastipaint.com

Jameson Evitts, Plant Manager, 989-681-5702, jevitts@plastipaint.com

Kevin Newell, Paint Manager, 989-681-5702, knewell@plastipaint.com

Facility Description:

Plasti-Paint, Inc. coats about 80% plastic and 20% metal parts with urethane coatings for mainly automotive applications. Currently, they are manufacturing 100% automotive parts for Subaru, Toyota, Chrysler, and Ford. They have done parts for Polaris in the past. The parts are received already formed, and in the case of the metal parts, they have an electrodeposition coating or are pretreated. No metal stamping or plastic molding of the parts is done at the facility. Plasti-Paint is considered a job shop. The facility is located in an industrial park off of State Road. The surrounding area is rural with some agricultural, commercial, and residential mixed in.

Plasti-Paint, Inc. is a synthetic minor source of volatile organic carbon (VOC) emissions with an uncontrolled potential to emit of greater than 250 tons per year (tpy). They have enforceable permit restrictions of 30 tpy of VOCs avoiding major New Source Review (NSR). The facility is considered a synthetic minor source for emissions of hazardous air pollutants (HAPs) with opt-out limits of less than 9.0 tpy of any individual HAP, and 22.5 tpy of aggregate HAPs. The facility has opted out of the Title V - Renewable Operating Permit (ROP) Program and any applicable federal standards with the permitted restrictions on emissions of HAPs. Plasti-Paint has two (2) active Permits to Install (PTI) 568-97D and PTI 145-19 along with some exempt processes.

Active Air Use Permits:

PTI 568-97D – Coating lines with optional control, and HAPs opt-out

Emission Unit (EU) /Flexible Group (FG) ID	Emission Unit Description
EU COATING LINE	Plastic and metal parts coating line consisting of three (3) paint spray booths, three (3) hand application pick-up booths, a five-stage parts washer, a natural gas-fired drying oven, a natural gas-fired cure oven and associated application equipment.
EU SPINDLE	Plastic and metal parts painting line consisting of two (2) spindle spray booths and two (2) natural gas-fired cure ovens.
FG FACILITY	All process equipment source-wide including equipment covered by other permits, grandfathered equipment, and exempt equipment.

PTI 145-19 (Replaced GPTI 183-13 – General permit for a natural gas-fired burnoff oven)

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)
EUB01	One batch natural gas-fired burnoff oven with a primary chamber fuel capacity of 325,000 Btu/hr and a secondary chamber (afterburner) capacity of 475,000 Btu/hr.

Exempt Equipment:

Rule 281(2)(h) - Cold cleaner / parts washer (new)

Rule 282(2)(b)(i) - Natural gas-fired space heaters

Rule 282(2)(g) – Diesel fuel-fired emergency generator

Rule 283(2)(b) – Paint lab

Rule 284(2)(b) – LP tank storage

Rule 285(2)(l)(vi) – Sanding buffing tables in main plant and another small plant building

Rule 287(2)(k) – Mix room for the coating lines

Michigan Air Emissions Reporting System (MAERS):

The facility reports to MAERS. There was a total of 27.3 tons of VOC emissions reported for 2021 from the facility. For EUCOATINGLINE, 26.4 tons of VOC emissions was reported which calculates to an uncontrolled VOC content of over 10 lb/gallon. I recommended that this be looked into because this seems it high. For EUSPINDLE, 0.89 tons of VOC emissions was reported which calculates to an uncontrolled VOC content of over 9 lb/gallon. Jameson will check changes in gallons of paint used and formulas in the recordkeeping system. Also, coating lines can run with the RTO off and this could result in increased VOC emissions.

Inspection:

Arrived: 9:30 am

Weather: 64°F, SSW @ 1 MPH, UV Index 1 low

Departed: 12:40 pm

I detected no odors around the facility. There were no visible emissions from the exhaust stacks.

A pre-inspection meeting was conducted with Jameson Evitts and Kevin Newell. Dave Bacon was unavailable. I gave a brief overview of the inspection process and facility operations were discussed. The facility is currently operating two (2) shifts per day (down from 3 shifts per day) and 5 days per week for the main coating line. Sunday at 8:00 pm is start-up and on Friday at 8:00 pm they stop spraying. For the spindle line, they run 1-shift, 3 to 5 days per week. They have about 85 employees for operations. Future plans for the facility include a new addition to the main plant building which will be used for storage and will house a new burnoff oven. The old burnoff oven currently permitted on PTI 145-19 will be decommissioned. A facility tour was then taken.

Coating Lines with Optional Control, and HAPs opt-out (PTI 568-97D):

Coating of plastic and pretreated metal (aluminum, galvanized steel) is done on EUCOATINGLINE. The coating line was installed in 1990, and robotic applicators were installed in 2007. They had replaced the robot in a booth (at the last inspection) as part of routine maintenance and repair with no change in quality, nature, and quantity of air emissions under Rule 285(2)(a). There have been no other replacements since.

The parts travel through the totally enclosed coating line on a 1000 foot long overhead conveyor that transports the parts on metal rack hangers. The coating of parts starts with a five (5) stage heated spray power washer (RO water, cleaning, and rinse additive), natural gas-fired dry-off oven (170°F to 175°F), six (6) spray booths, and an overhead natural gas-fired bake oven that operates at 185°F.

Main coating line booth information –

Booth 1	Cross draft recirculation dry filter booth with robotic spray application of 90% black adhesion promoters and primers - conventional applicators, purge pot in booth.
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Booth 2	Cross draft recirculation dry filter booth with manual spray application for touch-up of adhesion promoters and primers - conventional applicators, purge pot in booth.
Booth 3	Cross draft recirculation dry filter booth with two (2) robots for spray application of basecoats and color coats - conventional electrostatic applicators, purge pot in booth.
Booth 4	Cross draft recirculation dry filter booth with manual spray application for touch-up of basecoats and color coats - conventional applicators, purge pot in booth.
Booth 5	Cross draft recirculation dry filter booth with two (2) robots for spray application of clearcoats – bell, electrostatic applicators, and purge pot in booth.
Booth 6	Cross draft recirculation dry filter booth with manual spray application for touch-up of clearcoats - conventional applicators, purge pot in booth.

The filters in the prime and basecoat booths are changed at every shift. The filters in the clearcoat booths are changed every 2 to 3 days. This appears in compliance with Special Condition (SC) IV.1 for installing, maintaining, and operation of exhaust filters in a satisfactory manner. The booths are cleaned on the weekend.

The coating line is in a permanent total enclosure (PTE). Pressure drop across each booth is manually checked at each shift with a Shortridge automatic magnehelic gauge and recorded on a daily “Air Flow Checks” log. The Shortridge gauge was last calibrated on 9/23/20 and the next calibration due date is 9/23/23 according to the instrument tag. An operator took pressure drop readings on EUCOATINGLINE to demonstrate how this is done. The following readings were measured:

Prime Booth 1: 0.0260”

Prime Booth 2: 0.0302”

Basecoat Booth 3: 0.0300”

Clearcoat Booth 5: 0.0290”

This is satisfactory for SC IV.2 to verify that air is entering the PTE. Copies of the log sheets for the weeks of 1/3/22 through 6/27/22 were obtained. All pressure drop readings were above 0.007” as required by Method 204 for a PTE per SC III.5.

Plastic-Paint sprays 147 colors. The coatings are dispensed to the booths from 55-gallon drums for large coating runs and 5-gallon paint pots for smaller runs. The system was upgraded to gear pumps that mix the coating and catalyst at the booth while spraying. The coating and catalyst are no longer mixed in the paint storage and mix room before going to the coating line. The purge solvent (methyl ethyl ketone) used for color changes is also dispensed from 55-gallon drums. The paint is blown out of the lines in the booth, and then the purge solvent is run which goes to the purge bucket. There have been no changes in paint coating formulations.

VOC emissions from the coating line can be (are) controlled by a 26,000 cfm Durr regenerative thermal oxidizer (RTO). The RTO was installed in 2012 and is a refurbished unit. It has a pre-filter bed before the oxidizer zones. The RTO is used to meet the emission limits on PTI 568-97D and is permitted as a Rule 205 restriction. It is not permitted as Best Available Control Technology (BACT) via Rule 702. The oxidizer can be turned off, and the coating line can operate in bypass with VOC emissions venting uncontrolled out the bypass stacks from the booths and oven.

The RTO is pretty much always operated but the permit does allow coating of plastic parts uncontrolled. When coating metal parts, the RTO has to be operated per SC III.4. The coating lines only operate uncontrolled for short periods (1 day to a week) when the RTO is down for maintenance. The line has bypass stacks for uncontrolled operation. When the RTO is operated, a minimum temperature of 1375°F and a minimum destruction efficiency (DE) of 93.7% is required by SC IV.2.

The last time the RTO was tested was on September 17, 2019, and DE was measured at 93.9%. Oxidizer temperature had to be increased from the minimum temperature of 1375°F to 1465°F in order to achieve a DE of 93.9%. The permitted DE is 93.7%. The oxidizer will have to be operated at a higher temperature until a re-test is completed in order to meet the permitted DE. Regular maintenance of the unit with annual inspections is done. No obvious issues with the RTO have been identified by the service provider. The oxidizer is still being operated at 1465°F in order to maintain DE. There are no plans to retest the RTO in the near future.

The RTO temperature is continuously monitored, and the RTO set point is currently 1465°F. A spot check of the RTO temperature during the inspection showed it was operating at 1481°F. Temperature records were obtained demonstrating that the RTO is operated in compliance. Based on the monitoring records for temperature and pressure, it is assumed that the line is operated in compliance with SC IV.2. Temperature and pressure monitoring is done in a satisfactory manner as required by SC IV.3 and SC IV.4.

As part of the preventative maintenance (PM) program, the RTO is baked out annually. The next bake out is scheduled for July. The temperature of the exhaust from the bake out is 430°F. Smoke is only observed if there is too much build up in the unit. Smoke has not been observed from the unit during a bake out. The PM program for the facility is electronic and was switched to a new system in August 2021. All monitoring (temperature) and maintenance records can be accessed. Monthly downloads of temperature data for the RTO are available. Compliance with SC III.3 to implement and maintain a malfunction abatement plan (MAP) was demonstrated. There has really been no change in the MAP since 2012 other than to include the spindle coating line.

Spindle Coating Line (EUSPINDLE) -

A spindle coating line was originally installed under a general permit but is now on PTI 568-97D. The line is a refurbished line. Only blacks and greys are sprayed on the spindle line. Parts travel through the coating line on spindles moved by a chain-on-edge conveyor. The parts first go through a carbon dioxide (CO₂) booth for "snow" cleaning of the part. (A CO₂ tank provides the gas for the booth applicator/gun.) This cleaning station replaces the traditional aqueous parts washer. The part then goes to a dry filter booth (Booth 1) for robotic spray application of primer or basecoat. The part goes to an identical booth for a second coating. Then the part goes through a natural gas-fired drying oven. The spindle line is actually two identical lines consisting of a booth and oven combination that is operated as one line. It takes about 40 minutes to process a part on the spindle line as opposed to 3-hours for parts on EUCOATINGLINE.

Operation of the spindle coating line started in March 2016. Plasti-Paint is only coating plastic parts on the line, but it is also permitted for metal parts. The line was producing interior, plastic parts for a Chrysler Pacifica during the inspection.

The spray applicators on the spindle line are a cross between conventional and high volume low pressure (HVLP).

There is magnehelic gauges on the booths that measure pressure drop to determine when filters need to be changed. The gauges on the booths were both measuring 0.55" at the time of inspection. Filters are changed when 1.25" is measured.

The procedures for pressure monitoring of air into the booth are the same as for EUCOATINGLINE to meet the requirements of a PTE. A copy of the log sheet for the weeks of 6/2/22 through 6/27/22 was obtained. All pressure drop readings were above 0.007" as required by Method 204 for a PTE and per SC III.5.

VOC emissions from the spindle coating line are controlled by a 26,000 cfm Durr regenerative thermal oxidizer (RTO) shared with EUCOATINGLINE. The existing RTO had the capacity to add the emissions from the spindle line. The spindle line has bypass stacks for uncontrolled operation. The requirements for operating the RTO are identical to the requirements for EUCOATINGLINE since it is a shared RTO.

All stacks, bypass, and RTO, appear to be at the heights listed on PTI 568-97D, VIII. Stack/Vent Restrictions.

SC V.1 for EUCOATINGLINE and EUSPINDLE – Formulation data or Method 24?

Plasti-Paint gets Air Quality Data Sheets from the paint supplier for record keeping. They can run a Method 24 on coatings. I recommended they do this at a minimum annually on some of the more frequently used coatings to validate supplier data. An incoming batch VOC test with PPI test results / compared to NPAA incoming batch results dated 3/1/22 was provided. The sample was 50.28% solids, so I assume the remainder was VOC. The non-volatile material content of 49.99% and a density of 8.130 lb/gal was on the NPAA Certificate of Analysis for comparison. Using the density from the certificate, a VOC content of 4.04 lb/gallon was calculated by AQD. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. I recommend that a request be submitted if there are no Method 24 analysis on file.

Natural Gas-Fired Burnoff Oven (PTI 145-19):

The burnoff oven is located in a separate building from the main plant which includes a small machine shop. The metal racks from the coating line are cleaned in the burnoff oven. The oven is a Controlled Pyrolysis with a total heat input 800,000 Btu/hr including the afterburner. The oven normally operates 1 to 2 times per day.

On April 26, 2019, it was discovered that severe corrosion of the stack was causing a back draft/pressure into the oven. The oven was locked out and the stack removed. A new stack was ordered. Due to the stack corrosion issue, AQD staff requested that the chemical composition of the materials going into the oven be reviewed. Plasti-Paint contacted N/B Coating to look at several of the highest used materials for chlorinated compounds. It appears that Ad Pro (HP 20154-HSRG, FG32599) contains a chlorinated polymer. GPTI 183-13, SC III.1 prohibited putting halogenated materials (i.e., chlorinated polymers) into the burnoff oven. A PTI application for the burnoff oven was submitted since the process no longer met the requirements of the GPTI. PTI 145-19 was issued on December 6, 2019.

Per SC II.3, the permittee shall not process any material in EUB01 with a chlorine content of greater than 4.0%, by weight nor use EUB01 for the thermal destruction or removal of rubber, plastics, uncured paints, or any other materials containing sulfur or halogens (chlorine, fluorine, bromine, etc.) such as plastisol, polyvinyl chloride (PVC), or Teflon, with chlorine contents greater than allowed in SC II.3 per SC III.1. A current listing from the manufacturer of the chemical composition of each material (cured coating, oil, or grease) processed in EUB01, including the weight percent of each component is required per SC VI.4. Safety Data Sheets (SDS) and chemical content of the materials put into the burnoff oven were provided. A low HAPs Cond. Adhesion Promoter (HP 21054 HSRG) is being used that does not appear to contain a chlorinated polymer nor do any of the other materials burned off.

Per SC III.3, the permittee shall not operate EUB01 unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 90 days of permit issuance, and is implemented and maintained. The MAP was submitted on January 24, 2020 and is considered approved.

Temperatures are required to be continuously monitored and recorded, and EUB01 shall have an automatic temperature control system operated in a satisfactory manner per SCs IV. 2 and 3. Temperatures are monitored using a paper chart recorder meeting the requirements of SC IV.3 and SC VI.2. The oven operates at 800°F, and the afterburner typically operates at temperatures greater than 1400°F. Temperatures are monitored using a paper chart recorder. On the day of the inspection, the paper wheel was showing afterburner temperatures of ~1300°F for 5 runs. A spot check of the paper wheels for 1/2022 to 6/2022 all showed that the afterburner was operating between 1200°F to 1300°F less than 1400°F. The PTI requires a minimum afterburner temperature of 1400°F per SC IV.1 and there appears to be an issue.

After the inspection, facility staff provided the following information:

- * The thermocouple was found to be clean and in good working condition.
- * The afterburner set point was well above the 1400°F minimum temperature.
- * The gas valve was inspected and found to be dirty and potentially sticking, causing restricted flow.
- * The gas valve was cleaned and the afterburner temperature was again reaching above the 1400°F minimum temperature.

* As a result, a PM has been created for regular review/sign off of the temperature wheels to verify proper operation.

An interlock system that shuts down the primary chamber burner when the secondary chamber or afterburner is not operating properly is required to be installed per SC IV.4. A letter from Jackson Oven Supply dated 11/8/2019 was provided attesting to the fact that the oven has an interlock to shut the oven off if the primary burner has a malfunction.

Calibration of thermocouples per SC VI.1; records of the date, duration, and description of any malfunction of the control equipment, any maintenance performed and any testing results for EUB01 per SC VI.3; and current information from the manufacturer that EUB01 is equipped with a secondary chamber or afterburner, an automatic temperature control system for the primary chamber and secondary chamber or afterburner, and an interlock system per SC VI.5 were covered during the inspection.

Maintenance records as required in SC VI.3 are kept electronically in a satisfactory manner.

The burnoff oven vent stack is required to be 14 inches in diameter and 30 ft above ground level per SC VIII.1 and appears to be at the correct height.

Rule 287(2)(k) - Mix room for the coating lines (controlled)

The mix room is a separate room which holds materials for the coating lines in 55-gallon drums. The room air is ducted to the RTO. This meets the requirements of the permit exemption Rule 287(2)(k) for mixing, blending, or metering operations associated with a surface coating line.

Rule 281(2)(h) - Cold cleaner / parts washer

Also, in the mix room is a mask washer that uses methyl ethyl ketone (MEK) to clean off parts. It is run daily on the 3rd shift. It is a tank that tumbles parts in the washer fluid. It is directly ducted to the RTO. The lid was closed on it during the inspection. This appears to meet the requirements of exemption Rule 281(2)(h) for cold cleaners that have an air/vapor interface of not more than 10 square feet.

Rule 285(2)(g) – Diesel Fuel-Fired Emergency Generator

A 500-kW diesel fuel-fired emergency generator set (genset) has been installed. It is located just east of the RTO. The generator sits in a locked house and was not viewed on this visit. All information below is from the last inspection.

Cummins Power Generation:

Diesel-Genset, 60 Hz, 500 kW–Standby Rating

Engine Model QSX15-G9, No. 79972442, Family HCEXL015.AAJ

Displacement 912/15

Date of Mfg. 03/17

Emissions Certification, EPA, Tier 2, NSPS CI Stationary Emergency

Engine Hrs: 47.4 (as of 5/2/2019)

The engine is run 30-minutes (20-minutes full, 2-minutes cool down) weekly to test it. It hasn't been run for emergency power yet. The emergency generator is exempt from permitting per Rule 285(2)(g) for internal combustion engines that have less than 10 MMBtu/hr maximum heat input.

It is subject to 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE). The provisions of this subpart apply to CI ICE that commence construction (ordered) after July 11, 2005. According to the tags, the engine is certified, EPA, Tier 2. As long as the certification is maintained which requires that the engine be installed and configured according to the manufacturer's specifications, then compliance with 40 CFR 60, Subpart IIII is demonstrated.

It is subject to 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT) as a new emergency generator located at an area source of HAPs. This subpart establishes emission limitations and operating limitations for HAPs emitted from stationary RICE located at major and area sources of HAP emissions. For the diesel fuel-fired engine, compliance with RICE MACT is demonstrated through compliance with 40 CFR 60, Subpart IIII. This requires (at a minimum) that the generator be operated less than 100 hours per year (for readiness testing) and maintain an engine clock. Actual emergency operation is unlimited.

Rule 284(2)(b) – LP Tank Storage:

About 8 to 10 small portable LP tanks are stored outside the main plant building on a covered pad. The LP tanks are exempt from permitting per Rule 284(2)(b).

Rule 285(2)(I)(vi) – Sanding/Buffering Tables:

In a third building, hand sanding of parts is performed. In a separate room, two (2) downdraft tables with automatic hand-held sanders are vented to a fabric filter for particulate control. One (1) self-contained table vents into the room. Three (3) tables for hand sanding do not have any ventilation.

In the main plant are 4 buffering and inspection tables. Hand-held buffers are used and there is no exhaust to the outside ambient air. All particulate emissions from the sanding and buffering operations are contained within the room and buildings, and are exempt from permitting per Rule 285(2)(I)(vi). The buildings also have some storage areas.

Rule 283(2)(b) – Paint Lab;

A small paint lab to test coating quality is located in a separate room from the coating line and is exempt from permitting per Rule 283(2)(b).

Records:

VOC and HAP emissions – Monthly summary records for 2021, and Jan to June 2022 were obtained for EU COATINGLINE and EUSPINDLE. Usage information is collected daily and compiled into the monthly record. A copy of the May 2022 Daily Input was also obtained.

Records review shows that for EU COATINGLINE, VOC emissions on a 12-month rolling time period were 11.5 tpy by June 2022 below the VOC emission limits of 30.0 tpy for EU COATINGLINE and 30 tpy source-wide. The emissions of toxic air contaminants for EU COATINGLINE are as follows:

Cumene – 8.649 lb/yr on a 12-month rolling by June 2022 < 135.7 lb/yr limit

Ethyl benzene – 79.997 lb/yr on a 12-month rolling by June 2022 < 1146.7 lb/yr limit

Xylene – 5.47545 lb in May 2022 / 21 day = 0.2607 lb/calendar day (estimated by AQD based on May 2022 Daily Input.xls) < 25.8 lb/day

For the spindle line, VOC emissions on a 12-month rolling time period were 0.91 tpy by June 2022 and the highest monthly emissions were 221.1 lbs in March 2022 below the permitted limits of 2000 lbs/month, 10 tpy, and 30 tpy source-wide. The emissions of toxic air contaminants for EUSPINDLE are as follows:

Cumene – 0.36 lb/yr on a 12-month rolling by June 2022 < 71.7 lb/yr limit

Naphthalene - 0.633 lb/yr on a 12-month rolling by June 2022 < 57.4 lb/yr

Hexamethylene Diisocyanate (HDI) - 0.0558 lb in May 2022 / 11 (8-hr day) = 0.0051 lb/8-hr (estimated by AQD based on May 2022 Daily Input.xls) < 0.010 lb/8-hr

N-butyl acetate - 12.1509 lb in May 2022 / 11 (8-hr day) = 1.10 lb/8-hr (estimated by AQD based on May 2022 Daily Input.xls) < 247.9 lb/8-hr

Methyl n-amyl ketone - 0 lb in May 2022 / 11 (8-hr day) = 0 lb/8-hr (estimated by AQD based on May 2022 Daily Input.xls) < 81.4 lb/8-hr

Diisobutyl ketone - 0 lb in May 2022 / 11 (8-hr day) = 0 lb/8-hr (estimated by AQD based on May 2022 Daily Input.xls) < 52.4 lb/8-hr

N-butyl acetate - 12.1509 lb in May 2022 / 11 (8-hr day) = 1.10 lb/8-hr (estimated by AQD based on May 2022 Daily Input.xls) < 247.9 lb/8-hr

Isopropyl acetate - 0.77909 lb in June 2022 < 146.6 lb/8-hr

Tert-butyl acetate – No coating appears to contain this compound according to the May 2022 Daily Input.xls < 331.7 lb/8-hr

2,2,4 & 1,3,5-trimethylbenzene - 12.1526 lb in May 2022 / 11 (8-hr day) = 1.10 lb/8-hr (estimated by AQD based on May 2022 Daily Input.xls) < 42.0 lb/8-hr

Ethylbenzene - 0.0576 lb in May 2022 / 11 day = 0.0052 lb/calendar day (estimated by AQD based on May 2022 Daily Input.xls) < 214.9 lb/24-hr

Methyl ethyl ketone - 0 lb in May 2022 / 11 day = 0 lb/calendar day (estimated by AQD based on May 2022 Daily Input.xls) < 214.9 lb/24-hr

Facility-wide aggregate HAP emissions on a 12-month rolling time period were 0.58 tpy by June 2022. The highest single HAP emission was xylene at 0.05 tpy on a 12-month rolling time period by

June 2022. Plasti-Paint appears to be in compliance with the facility-wide HAPs limits of 9.0 tpy for a single HAP and 22.5 tpy for aggregate HAPs.

Five (5) SDS of the most commonly used paint coatings were obtained:

- 00115 R 798/35 GAL BLACK FG50552
- 16005 R 788 LGM/5 GAL LIQUID GLASS MONOCOAT FG48690
- HP 21054HSRG/40 GAL LOW HAPS COND. ADHES. PROMOTE FG32599
- R 788 RC/40 GAL 2K CLEARCOAT FG29500
- COND R221/40 GAL COND BLACK PRIMER FG42642

RTO – Electronic temperature records (15-min intervals) for 1/15/2022 to 6/26/2022 were obtained.

Summary:

The facility appeared to be in compliance with the applicable rules and regulations, and PTI 568-97D. For PTI 145-19, the issue with the burnoff oven was resolved but a VN letter will still be sent for a violation of a special condition. As discussed, Plasti-Paint has purchased a new burnoff oven to be on site in the new addition which will have better controls and allow closer oversight of the process. A PTI application for the new burnoff oven will need to be submitted before it can be installed.

NAME Julie L. Brunner

DATE 8/19/2022

SUPERVISOR RB