

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

N281259788

FACILITY: LEXAMAR CORPORATION		SRN / ID: N2812
LOCATION: 100 LEXAMAR DRIVE, BOYNE CITY		DISTRICT: Gaylord
CITY: BOYNE CITY		COUNTY: CHARLEVOIX
CONTACT:		ACTIVITY DATE: 08/17/2021
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: On-site inspection and Records Review		
RESOLVED COMPLAINTS:		

On Tuesday, August 17, 2021, Caryn Owens of the Department of Environment, Great Lakes, and Energy (EGLE) – Air Quality Division (AQD) conducted an onsite inspection of Lexmar Corporation (Lexamar) (SRN: N2812) located at 100 Lexamar Drive in Boyne City, Charlevoix County, Michigan. The field inspection and records review were to determine compliance with the Renewable Operating Permit (ROP) MI-ROP-N2812-2015b. The site is currently a major source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs), and the source is subject to the following Federal regulations: National Emission Standard for Hazardous Air Pollutants (NESHAPs): for Surface Coating of Plastic Parts and Products in 40 CFR Part 63, Subpart PPPP; and Commercial, and Institutional Boilers and Process Heaters in 40 CFR Part 63, Subpart DDDDD. Additionally, a consent order was cited January 16, 2019, to the facility due to alleged failure to operate the coating lines without proper operation of the of the regenerative thermal oxidizer (RTO) and operating the coating line without proper control efficiency and RTO temperatures. The consent order has not been terminated as of the date of the field inspection. This ROP is currently in Renewal, and the consent order will be addressed during the Renewal.

Summary:

The activities covered during the field inspection and records review for the facility indicates the facility was in compliance with MI-ROP-N2812-2015b. Specific permit conditions that were reviewed are discussed below.

On-site Inspection:

During the field inspection the weather conditions were sunny, about 81 degrees Fahrenheit, and calm winds about 0 to 5 miles per hour from the southwest. AQD met Mr. Breen Merriam the Human Resource Manager and Mr. Kelly Bellant, the Environmental Engineer of Lexamar, for a facility inspection and records review. Mr. Bellant escorted AQD through the facility to observe the permitted emission units and associated processes. Lexamar produces and coats a variety of plastic parts for the automotive industry. The facility either produces plastic parts from on-site plastic injection molding machines to be coated, or plastic parts that are shipped in for coating. There are two main coating lines (EU-BCPL and EU-URSAMINOR) for the parts, where LexaMar applies basecoats, adhesion promoters, and topcoats to plastic automotive parts. The emissions from the two coating lines are captured by two Permanent Total Enclosures (one for each emission unit) and ducted to an RTO. The RTO consists of two beds described as Bed-A and Bed-B. Each bed consists of one 25,000 standard cubic feet per minute (scfm) unit. Bed-A and Bed-B have a common exhaust stack. Typically, one bed is used at a time while the second bed

acts as a backup, however both beds operate at the same time to keep the temperature high enough for on-demand changeover. The RTO is used for the destruction of VOCs and HAPs.

Additionally, there is another coating booth called EU-BLACKOUT which is a manual spray booth that applies primer coating to plastic automotive roof panels, with its associated curing oven. AQD also observed the paint storage areas and the solvent storage area. The general maintenance and housekeeping of the facility appeared very good, and no visible emissions or odors were present outside of the facility during the inspection.

The combustion chamber of RTO Bed-A was 1,775 degrees Fahrenheit and RTO Bed-B was 1,763 degrees Fahrenheit during the inspection. RTO Bed-A was on standby during the inspection and Bed-B was in use. The differential pressures for EU-BCPL was 0.0299 inches water column (“wc) for the AP booth and 0.0413 “wc for the oven. The differential pressures for EU-URSAMINOR were 0.0246 the prime coat and 0.0217 for the topcoat booth.

Lexamar is claiming the following exemptions at the facility from air permitting:

- EU-GASCOMBUSTION, which includes all natural gas fired, roof-mounted space heaters that meet exemption R 336.1282(2)(b)(i).
- EU-WASHERHEATER, which is a 2.50 MMBtu/hr natural gas fired water heater that meets exemption R 336.1282(2)(b)(i).
- EUASSEMBLY, which is for the batch assembly oven used for the annealing of plastic parts that meets exemption R 336.1290.
- EU-ROOFBOND, which is for application of an adhesive and an associated heated press used in the bonding of a metallic frame to a plastic automotive roof panel which meets exemption R 336.1290.
- EU-BLACKOUT, which is for the manual spray primer coating application booth and associated curing oven for plastic automotive roof panels that meets exemption R 336.1287 (c).
- EU-MAINTCLEANER which is for a non-production parts cleaner located in the maintenance area which meets exemptions Rule 281(2)(h) and Rule 285(2)(r)(iv).

Records Review:

EU-BCPL: This emission unit is for the Body Color Paint Line (BCPL) which includes 5 spray booths, 5 flash-off areas, an associated curing oven, an exhaust air recirculation system for the spray booths. Control includes a Permanent Total Enclosure (PeTE), filters on the spray booth and a RTO.

I. Emission Limits:

The emission limits are 8.6 pounds per hour and 37.6 tons per year based on a 12-month rolling time period. Based on the most recent VOC Emission reports, the VOC emissions reported from May 1, 2020 through April 31, 2021 were 3.0 pounds per hour and 2.7 tons per year based on a 12-month rolling time period. Based upon the records reviewed, the facility is within the permitted VOC emission limits.

II. Material Limits:

Material Limits are not applicable for EU-BCPL.

III. Process/Operational Restrictions:

The RTOs shall not operate unless they are operating at a minimum of 1,400 degrees Fahrenheit. During the inspection, the RTO Bed-A was operating at a temperature of 1,775 degrees Fahrenheit and the RTO Bed-B was operating at a temperature of 1,763 degrees Fahrenheit.

The minimum overall VOC control efficiency (combined capture and destruction) is not to be less than 95 percent across EU-BCPL. Based on the most recent capture and destruction efficiency performance test, completed April 18-20, 2017, for the RTOs, the overall combined control efficiency was 98.4 percent for Bed-A, 95.9 percent for Bed-B, and 95.9 percent for both Beds A and B operating simultaneously.

During the field inspection, the 5 spray booths exhaust recirculation system, flash off areas, curing area, and RTOs appeared to be operating properly.

The most recent Malfunction Abatement Plan (MAP) on file at AQD was approved by AQD on February 22, 2019. The MAP addresses preventative maintenance of the RTO, Performance monitoring variables, corrective action in the event of equipment failure, and fugitive air emissions minimization procedures. No malfunctions were reported between August 1, 2020 through July 31, 2021.

IV. Design/Equipment Parameters:

According to Mr. Bellant, the RTO has a minimum 0.5 second retention time, and the temperature is continuously monitored and records in the centers of RTO Bed-A and Bed-B. The differential pressure is monitored on a continuous basis and shows compliance with PeTE.

V. Testing/Sampling:

The five most frequently used coatings and five coatings at random are tested annually for VOC content, as applied, minus water. The last analysis was completed December 11, 2020.

April 18-20, 2017 was the most recent capture and destruction efficiency testing that was completed for the facility. Based on the testing data of the RTOs, the overall combined control efficiency was 98.4 percent for Bed-A, 95.9 percent for Bed-B, and 95.9 percent for both Beds A and B operating simultaneously.

VI. Monitoring/Recordkeeping:

Records of applicator system malfunctions (booths 1 - 5), including the date, description, and the duration of the applicator malfunction are maintained onsite, and included with the facility semi-annual reports. AQD has not received reported malfunctions within the last year from the facility. According to Mr. Bellant, there have been no recent malfunctions of the booths.

The center bed temperature is used as an indicator of the proper functioning of the RTO for Bed-A and Bed-B. Additionally, the differential pressure between the PeTE and the outside room as an indicator of the proper functioning of the PeTE. The appropriate differential pressure defining proper function of the

PeTE is a minimum reading of 0.007 inches. Based on the records review and the field inspection, the RTO and PeTE were operating properly.

Additionally, the facility submits CAM reports on a quarterly basis, and informs AQD of excursions/exceedances and any monitoring downtime at the facility with respect to the RTO and PeTE. Based on the records reviewed, no CAM exceedance or excursions were reported between August 1, 2020 through July 31, 2021.

The facility records VOC content of coating, reducers, catalysts, and other additives used in the process in pounds per gallon, minus water used on a calendar day. The facility calculates the VOC emission rates in pounds per hour and tons year based on a 12-month rolling time period, which are discussed above under Emission Limits.

VII. Reporting:

Reporting of any deviations, quarterly reports, semi-annual reports, and annual compliance reports for ROP certification were submitted to the AQD in timely manner.

Based on the most recent semi-annual report from between January 1, 2021 through June 30, 2021), the facility reported no deviations.

The facility submitted quarterly reports that demonstrated compliance with VOC emission limits and material limits. Additionally, the facility submitted the proper testing protocol and reports to the AQD within a timely manner.

During the reporting period the facility reported all monitoring and associated recordkeeping requirements of the ROP. Based on the records reviewed, no CAM exceedance or excursions were reported on the quarterly reports between the time period of August 1, 2020 through July 31, 2021.

VIII. Stack/Vent Restrictions:

The stack heights for EU-BCPL were in compliance with the ROP diameters and heights.

IX. Other Requirements:

The facility has an approved Malfunction Abatement Plan and air pressure differential monitoring plan on file with AQD. The equipment at the facility appeared to be well maintained.

EU-URSAMINOR: This emission limit applies to the Ursa Minor Dip Coat Line includes 2 dip tanks, an associated curing oven, and is controlled by PeTE and the RTOs.

I. Emission Limits:

The emission limits are 14.9 pounds per hour and 29.7 tons per year based on a 12-month rolling time period. Based on the most recent VOC Emission reports, the VOC emissions reported from May 1, 2020 through April 31, 2021 were 4.0 pounds per hour and 5.8 tons per year based on a 12-month rolling time period.

Based upon the records reviewed, the facility is within the permitted VOC emission limits.

II. Material Limits:

Material Limits are not applicable for EU-BCPL.

III. Process/Operational Restrictions:

During the inspection I observed the waste materials stored in closed containers, and the location of coatings, reducers, solvents and thinners.

The two dip tanks and the exhaust air recirculation system and the RTO control system appeared to be operating properly. As previously stated above, the RTOs shall not operate unless they are at a minimum of 1,400 degrees Fahrenheit. During the inspection, the RTO Bed-A was operating at a temperature of 1,775 degrees Fahrenheit and the RTO Bed-B was operating at a temperature of 1,763 degrees Fahrenheit.

The appropriate differential pressure defining proper function of the PeTE is a minimum reading of 0.007 inches for the two dip tanks and the adjacent area monitored on a continuous basis. During the inspection, the differential pressure drop for the primer dip tank was 0.0246 and 0.0217 for the topcoat dip tank.

EU-URSAMINOR uses an automatic system for measurement to control of the volumes of coating, reducer, catalyst, and other materials used during operation of the coating line. This system is recorded in a computer system. If the automatic measurement and control system malfunctions, the facility manually inputs and records the materials of the dip tanks. If the system malfunctions, then the facility will report the malfunction to AQD. No malfunctions of the automatic measurement and control system have been reported to AQD within the past year.

The minimum overall VOC control efficiency (combined capture and destruction) is not to be less than 95 percent across the RTO. Based on the most recent capture and destruction efficiency performance test, completed April 18-20, 2017, for the RTOs, the overall combined control efficiency was 98.4 percent for Bed-A, 95.9 percent for Bed-B, and 95.9 percent for both Beds A and B operating simultaneously.

As previously stated above, the most recent Malfunction Abatement Plan (MAP) on file at AQD was approved by AQD on February 22, 2019. No malfunctions were reported between August 1, 2020 through July 31, 2021.

IV. Design/Equipment Parameters:

As previously stated, the RTO has a minimum 0.5 second retention time, and the temperature is continuously monitored and records in the centers of RTO Bed-A and Bed-B. The differential pressure is monitored on a continuous basis and shows compliance with PeTE.

V. Testing/Sampling:

The five most frequently used coatings and five coatings at random are tested annually for VOC content, as applied, minus water. The last analysis was completed December 11, 2020.

April 18-20, 2017 was the most recent capture and destruction efficiency testing that was completed for the facility. Based on the testing data of the RTOs, the overall combined control efficiency was 98.4 percent for Bed-A, 95.9 percent for Bed-B, and 95.9 percent for both Beds A and B operating simultaneously.

VI. Monitoring/Recordkeeping:

The facility records VOC content of coating, reducers, catalysts, and other additives used in the process in pounds per gallon, minus water used on a calendar day. The facility calculates and records VOC emission rates in pounds per day, tons per month, and tons per 12-month rolling time period, which are discussed above under Emission Limits.

As previously stated, the center bed temperature is used as an indicator of the proper functioning of the RTO for Bed-A and Bed-B. Additionally, the differential pressure between the PeTE and the outside room as an indicator of the proper functioning of the PeTE. The appropriate differential pressure defining proper function of the PeTE is a minimum reading of 0.007 inches. Based on the records review and the field inspection, the RTO and PeTE were operating properly.

Additionally, the facility submits CAM reports on a quarterly basis, and informs AQD of excursions/exceedances and any monitoring downtime at the facility with respect to the RTO and PeTE. Based on the records reviewed, no CAM exceedance or excursions were reported between August 1, 2020 through July 31, 2021.

VII. Reporting:

Reporting of any deviations, quarterly reports, semi-annual reports, and annual compliance reports for ROP certification were submitted to the AQD in timely manner.

Based on the most recent semi-annual report from between January 1, 2021, through June 30, 2021), the facility reported no deviations.

The facility submitted quarterly reports that demonstrated compliance with VOC emission limits and material limits. Additionally, the facility submitted the proper testing protocol and reports to the AQD within a timely manner.

During the reporting period the facility reported all monitoring and associated recordkeeping requirements of the ROP. Based on the records reviewed, no CAM exceedance or excursions were reported on the quarterly reports between the time period of August 1, 2020 through July 31, 2021.

VIII. Stack/Vent Restrictions:

The stack heights for EU-URSAMINOR were in compliance with the ROP diameters and heights.

IX. Other Requirements:

As previously stated, the facility has an approved Malfunction Abatement Plan and air pressure differential monitoring plan on file with AQD. The equipment at the facility appeared to be well maintained.

EU-SOLV: This emission unit includes the use of miscellaneous solvents for the following purposes: wiping parts to be coated on the Ursa Minor Dip Coat Lines; cleaning the tanks for the Ursa Minor Dip Coat Lines; cleaning spray guns and cleaning booths and equipment for the Body Color Paint Line. The RTO control system is used during cleaning of spray guns on the EU-BCPL, otherwise, no control device is associated with this emission unit.

I. Emission Limits:

The emission limits are 7.8 pounds per hour and 20 tons per year based on a 12-month rolling time period. Based on the most recent VOC Emission reports, the VOC emissions reported from May 1, 2020 through April 31, 2021 were 1.0 pounds per hour and 3.3 tons per year based on a 12-month rolling time period. Based upon the records reviewed, the facility is within the permitted VOC emission limits.

II. Material Limits:

Material Limits are not applicable for EU-SOLV.

III. Process/Operational Restrictions:

Solvent-laden rags, waste clean-up solvent, and residue from cleaning of spray booths, dip tanks are reclaimed, recycled, and/or disposed of in an acceptable manner. During the field inspection I observed the storage area for the solvents and solvent waste, and the containers were closed and labeled.

IV. Design/Equipment Parameters:

Design/Equipment Parameters are not applicable for EU-SOLV.

V. Testing/Sampling:

Testing/Sampling Parameters are not applicable for EU-SOLV.

VI. Monitoring/Recordkeeping:

Environmental Data sheets (EDS) are stored in the computer system at the facility.

The facility records the usage of each solvent used, for clean-up and purge solvents, the amount of solvent reclaimed, the VOC content in pounds per gallon (minus water) and the density of each clean-up and purge solvent in pounds per gallon. The facility calculates and records VOC emission rates in pounds per hour, tons per month, and tons per 12-month rolling time period, which are discussed above under Emission Limits.

VII. Reporting:

Reporting of any deviations, quarterly reports, semi-annual reports, and annual compliance reports for ROP certification were submitted to the EGLE in timely manner.

Based on the most recent semi-annual report from between January 1, 2019 through June 30, 2019), the facility reported no deviations.

The facility submitted quarterly reports that demonstrated compliance with VOC emission limits and material limits.

VIII. Stack/Vent Restrictions:

Stack/Vent Restrictions are not applicable for EU-SOLV.

IX. Other Requirements:

All purge solvents, spent filters, and waste coatings are stored in 55-gallon drums and stores them properly in a chemical storage room, awaiting proper disposal.

FG-PPPP: Requirements of the surface coating of plastic parts and products as required by 40 CFR, Part 63, Subpart PPPP. FG-PPPP is applicable for emission units EU-BCPL, EU-URSAMINOR, EU-SOLV. The pollution control equipment for FG-PPPP is the RTOs and PeTE. The RTOs are only applicable when the company chooses to use the “emission rate with add-on control” option.

I. Emission Limits:

Lexamar uses “the general use coating affected source” emission limits for organic HAPs, which is 0.16 lb HAP per pound of coating solids base “emission rate with add-on controls” compliance option d on 12-month rolling time period. Based on the most recent quarterly VOC Rolling PPPP Compliance Report, dated July 28, 2021, the HAP emissions indicated the affected source compliance limit for all FG-PPPP subject emission units combined was 0.013 pounds HAP per 12-month rolling time period of coating solids. The affected source emission units in the reports indicated EU-URSAMINOR, EU-BCPL, EU-BLACKOUT, EU-ROOFBOND, and EU-SOLV are subject to 40 CFR Part 63, Subpart PPPP. Emission control was not accounted for EU-BLACKOUT, EU-ROOFBOND, and EU-SOLV emissions, since these emission units do not vent to the RTO. Based on the records reviewed, the facility is within the permitted HAP emission limit without using control.

II. Material Limits:

The facility is not using the “Compliant material option” option, and therefore material limits do not apply.

III. Process/Operational Restrictions:

Lexmar uses the “Emission rate with add-on controls” compliance option. The 3-hour average combustion temperature must not fall below the temperature established during testing. During the inspection, the RTO Bed-A was operating at a temperature of 1,775 degrees Fahrenheit and the RTO Bed-B was operating at a temperature of 1,763 degrees Fahrenheit. Based on the records reviewed,

the average 3-hour average temperature was above the temperature established during testing.

Additionally, the proper function of the PeTE and temporary total enclosure were met during stack testing. The minimum overall VOC control efficiency (combined capture and destruction) is not to be less than 95 percent across the RTO. Based on the most recent capture and destruction efficiency performance test of the RTOs, the overall combined control efficiency was 98.4 percent for Bed-A, 95.9 percent for Bed-B. The operating limits for emission capture systems are monitored continuously.

Lexamar appears to be following their Work Practice Plan which minimizes spills of HAP containing materials, assures HAP containing materials are stored and disposed of properly.

The facility submitted a combined MAP, PMP, and Start-up, Shutdown, Malfunction Plan of the facility dated, August 3, 2017. The facility appears to be following the combined plan.

IV. Design/Equipment Parameters:

The facility continuously monitors the temperature of the RTO, differential pressures of the booths, the operating parameters indicated proper functioning of the RTO and PeTE.

V. Testing/Sampling:

As previously stated, April 18-20, 2017 was the most recent capture and destruction efficiency testing of the facility, which established operating and monitoring parameters for the facility.

VI. Monitoring/Recordkeeping:

Records were on file at Lexamar from the manufacturer that were used to determine the mass fraction of organic HAP and density of each coating, thinner, and other additives. These records were available and used to calculate the organic HAP emissions from the facility. The emission calculation records documenting compliance with the organic HAP emission limit were submitted in the quarterly certification reports for FG-PPPP.

VII. Reporting:

Reporting of semi-annual and annual compliance reports for ROP certification were submitted to the AQD in timely manner. During the reporting period, the permittee reported all monitoring and associated recordkeeping requirements of the ROP, and there were no deviations.

VIII. Stack/Vent Restrictions:

Stack/Vent Restrictions are not applicable with FG-PPPP.

IX. Other Requirements:

The facility is currently showing compliance with FG-PPPP using the emission rate with add-on control.

FGCOLDCLEANERS: The facilities parts cleaner appeared to be well maintained. According to Mr. Bellant, the parts cleaner is rarely used, and the facility is thinking about removing it from the source. During the field inspection, I observed the parts cleaner stored behind a bunch of equipment with the lid closed. AQD recommended removing the parts cleaner from the ROP if they remove it from the facility.

FGRULE287(c): This flexible group covers any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification. Currently, the only emission unit operating under this exemption is EU-BLACKOUT.

I. Emission Limits:

Coating usage is limited to 200 gallons per month, minus water, as applied. According to the records reviewed EU-BLACKOUT uses between 4.7 to 63.7 gallons of coating materials per month.

II. Material Limits:

Material Limits are not applicable for FGRULE287(c).

III. Process/Operational Restrictions:

Process/Operational Restrictions are not applicable for FGRULE287(c).

IV. Design/Equipment Parameters:

Lexamar properly maintains usage records for EU-BLACKOUT.

V. Testing/Sampling:

Testing/Sampling Parameters are not applicable for FGRULE287(c).

VI. Monitoring/Recordkeeping:

As previously stated, Lexamar maintains and records the volume of coatings used and any filter replacements for exhaust systems serving coating spray equipment. This documentation was available for review during the inspection for EU-BLACKOUT.

VII. Reporting:

Reporting of any deviations, quarterly reports, semi-annual reports, and annual compliance reports for ROP certification were submitted to the EGLE in timely manner.

Based on the most recent semi-annual report from between January 1, 2019 through June 30, 2019), the facility reported no deviations.

VIII. Stack/Vent Restrictions:

Stack/Vent Restrictions are not applicable for FGRULE287(c).

IX. Other Requirements:

Other Requirements are not applicable for FGRULE287(c).

FGRULE290: This flexible group is for the application of an adhesive and an associated heated press used in the bonding of a metallic frame to a plastic automotive roof panel, and the batch assemble oven used for the annealing of plastic parts. This flexible group contains emission units EU-ROOFBOND and EU-ASSEMBLY.

I. Emission Limits:

Coating usage is limited to less than 1,000 pounds per month. According to the records reviewed the facility used 190 pounds per month, based on a 12-month rolling average. The emissions from FGRULE290 are uncontrolled.

II. Material Limits:

Material Limits are not applicable for FGRULE290.

III. Process/Operational Restrictions:

As stated above, the provisions of Rule 290 are applicable for EU-ROOFBOND and EU-ASSEMBLY.

IV. Design/Equipment Parameters:

Design/Equipment Parameters are not applicable for FGRULE290.

V. Testing/Sampling:

Testing/Sampling Parameters are not applicable for FGRULE290.

VI. Monitoring/Recordkeeping:

Environmental Data sheets (EDS) are stored in the computer system at the facility.

The facility records usage of each adhesive used, and calculates and records VOC emission rates in pounds per hour, tons per month, and tons per 12-month rolling time period, which are discussed above under Emission Limits.

VII. Reporting:

Reporting of any deviations, quarterly reports, semi-annual reports, and annual compliance reports for ROP certification were submitted to the EGLE in timely manner.

Based on the most recent semi-annual report from between January 1, 2019 through June 30, 2019), the facility reported no deviations.

VIII. Stack/Vent Restrictions:

Stack/Vent Restrictions are not applicable for FGRULE290.

IX. Other Requirements:

Other Requirements are not applicable for FGRULE290.

FG-DDDDD: This flexible group contain the requirements for existing boilers and process heaters with a heat input capacity of <10 MMBTU/hr for major sources of HAP emissions per 40 CFR Part 63, Subpart DDDDD (Boiler MACT). These boilers or process heaters are designed to natural gas only. The emission units included are EU-WASHERHEATER (2.50 MMBtu/hr natural gas-fired water heater.), EU-URSDRYOFFOVEN (1.65 MMBtu/hr natural gas-fired water heater.), EU-URSAPRIMEOVEN (1.65 MMBtu/hr natural gas-fired water heater.), EU-URSATOPCOATOVENA (1.65 MMBtu/hr natural gas-fired water heater.), and EU-URSATOPCOATOVENB (1.65 MMBtu/hr natural gas-fired water heater.)

I. Emission Limits:

Emission Limits are not applicable with FG-DDDDD.

II. Material Limits:

Material Limits are not applicable for FG-DDDDD.

III. Process/Operational Restrictions:

The facility completed an energy assessment five boilers under the FG-DDDDD on February 8, 2016. The most recent tune-up of the 5 boilers were completed on February 18, 2021.

IV. Design/Equipment Parameters:

Design/Equipment Parameters are not applicable for FG-DDDDD.

V. Testing/Sampling:

Testing/Sampling is not applicable for FG-DDDDD.

VI. Monitoring/Recordkeeping:

Lexamar maintains records of each notification and report for each boiler, and keeps records of maintenance and corrective actions associated with the boilers.

VII. Reporting:

Semi-annual reports and annual compliance reports for ROP certification were submitted to the AQD in timely manner. No deviations for FG-DDDDD were reported. The most recent boiler tune-up compliance report was received by AQD on March 4, 2021.

VIII. Stack/Vent Restrictions:

Stack/Vent Restrictions are not applicable for FG-DDDDD.

IX. Other Requirements:

The facility appears to comply with 40 CFR Part 63, Subpart DDDDD requirements for FG-DDDDD.

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SUPERVISOR _____