

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

N565663609

FACILITY: NYLOK LLC		SRN / ID: N5656
LOCATION: 15260 HALLMARK Court, MACOMB		DISTRICT: Warren
CITY: MACOMB		COUNTY: MACOMB
CONTACT: Martin Lewis , General Manager		ACTIVITY DATE: 07/12/2022
STAFF: Kerry Kelly	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: FY 2022 Inspection		
RESOLVED COMPLAINTS:		

On July 12, 2022, I (Kerry Kelly, EGLE-AQD) conducted an inspection of Nylok LLC (Nylok), located at 15260 Hallmark Court in Macomb, Michigan. The purpose of this inspection was to determine the facility's compliance with the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; Renewable Operating Permit (ROP) No. MI-ROP-N5656-2020 and 40 CFR Part 63 Subpart Mmmm – National Emissions Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63 Subpart Mmmm).

I arrived on site around 10:00 AM. I met with Martin Lewis, General Manager, Nylok. Martin answered questions and provided a walkthrough of facility. In addition, Martin provided hard copies of some records during the inspection and other records via email after the inspection.

FACILITY DESCRIPTION/REGULATORY ANALYSIS

Nylok is located in Macomb County which is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the 8-hour ozone standard. The facility is immediately surrounded by commercial and industrial properties. The nearest residential properties are located 500 feet north of Nylok. Nylok is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is equal to or more than 25 tons per year.

Nylok currently uses 15 liquid coating lines (10 gravity-fed adhesive coating lines, one line with intermittent air driven machines, 3 flow coating lines, 2 other liquid coating lines) and several powder coating lines to apply specialty coatings and adhesives to a variety of metal materials, including stainless steel, aluminum, and chromium, to prevent galvanic corrosion and to enhance the lock-ability of fasteners. These products are commonly used in automotive, aerospace, military, and agricultural equipment.

Martin stated that there are not any boilers, cold cleaners, or emergency generators at the facility. I did not see any boilers, cold cleaners, or generators while on site.

VOC and HAP emissions from the coating lines in FG-COATINGLINEA (EU-PR1, EU-PR2, EU-PR4, EU-PR5, EU-PR6, EU-PR7, EU-PR8, EU-PR9, EU-PR10, EU-PRB1, EU-PRN3) are captured using a permanent total enclosure (PTE) and are destroyed by a regenerative thermal oxidizer (RTO). The emission units in FG-COATINGLINEA use Precote and 3M coatings/adhesives. These coatings have been previously determined to be best available control technology (BACT). The PTE and RTO meet BACT for VOCs for FG-COATINGLINEA under Rule 702(a).

FG-COATINGLINEB (EU-NTQ1, EU-PB3, EU-WN3, EU-WN9, EU-HDN1) operates under the exempted emission rates in Rule 621(10), satisfying BACT requirements under Rule 702(d). The coating lines in FG-COATINGLINEA and FG-COATINGLINEB are subject to the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products promulgated in 40 CFR Part 63, Subparts A and Mmmm (MACT Mmmm).

FG-COATINGLINEA is subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64 because FG-COATINGLINEA is subject to an emission limitation or standard (VOC limit), a control device is used to achieve compliance with the VOC emission limitation, and FG-COATINGLINEA has potential pre-control device VOC emissions equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

Although Nylok is no longer mixing coatings and adhesives at the facility, the company requested to keep the conditions for the mixing process (EU-MIXING) in the source-wide PTI and ROP in case it is needed in the future.

Nylok and EGLE stipulated to the termination of violation proceedings for violations received September 13, 2013, January 28, 2014, and January 6, 2015 by entry into Consent Order (CO) Nos. 44-2014 and 28-2015.

Pursuant to paragraph 18 of CO Nos. 44-2014 and 28-2015, Nylok requested to terminate both COs in April 2020. Review of Nylok's request and supporting information indicated Nylok achieved compliance with the terms and requirements of the COs. Effective 4/21/2020, CO Nos 44-2014 and 28-2015 are terminated.

COMPLIANCE EVALUATION

EU-MIXING

According to Martin, Nylok has not performed mixing at the facility for at least 5 years and the room where EU-MIXING had been located is now used for storage. In addition, the Michigan Air Emissions Reporting System (MAERS) reports submitted by Nylok for each year between 2015-2021 indicate that EU-MIXING was not operated between 2015-2021.

During the inspection, Martin showed me the room where he stated EU-MIXING was previously located. In this room I observed sealed drums and containers labeled Pre-Cote, Toluol Nitration, Nytorq, and isopropyl alcohol (IPA). I did not see any mixing vessels/equipment in this room. I did see duct work, open on one end, running along the ceiling. According to Martin, air from the room is drawn through this duct and out to the ambient air.

Compliance with the conditions in MI-ROP-N5656-2020, EU-MIXING, were not evaluated because the mixing equipment was not installed during the inspection and, based on Martin's statements and Nylok's MAERS reports, has not been operated since at least 2015.

FG-COATINGLINEA

This flexible group consists of eleven coating lines that may use HAP-containing coatings. FG-COATINGLINEA is located within the PTE. Captured VOC/HAP emissions are destroyed by an RTO. The FG-COATINGLINEA table in the ROP contains conditions that were established pursuant to Rule 201(1)(a), including Rule 225 and Rule 702, and 40 CFR Part 64 (Compliance Assurance Monitoring (CAM)).

I inspected the coating lines, RTO and PTE in/for FG-COATINGLINEA during the inspection. All lines except PR-N3 and PR-B1 were being operated during the inspection. In addition, according to Martin, EU-PR6 was removed from the facility because it was damaged. While inspecting EU-PR1 and EU-PR2, I observed that each line had three coating nozzles that dispensed a continuous stream of liquid. Each coating nozzle on EU-PR1 appeared to be approximately 3 mm in diameter. The nozzles on EU-PR2 appeared to be smaller than the nozzles on EU-PR1. On the floor near the coaters for EU-PR1 I observed a container labeled Pre-Cote 80. The container was covered during the inspection. On the coating lines, bolts travel on a conveyor, passing through the coating streams. Below the coating nozzles I saw a small trough with a hole on the bottom where coating drains. There was a tube connected to the drain hole on the under side of the trough. The tube ran from the trough back to the coating system, to be re-used in the coaters.

FG-COATINGLINEA Special Condition (SC) I.1 limits the 12-month rolling VOC emission from FG-COATINGLINEA to 5.0 tons per year (tpy). VOC emission records provided by Martin for September 2020 through May 2022 (Attachment 1), required in SC VI. 6, indicate the highest 12-month rolling VOC emissions from FG-COATINGLINEA were 0.5 tons occurring in the 12-month periods ending April through October 2021.

Nylok, per SC III.1 and 2, is required to capture all waste materials and store all waste and HAP/VOC containing materials in closed containers. During the inspection, all of the waste, coating, and solvent product containers that I observed were covered. I did not see any spills, nor coatings, cleaning materials, or waste materials being conveyed, during the inspection. In addition, Martin provided records of inspections done in accordance with the Work Practice Plan for January 2022 - July 2022 (Attachment 2). According to these records, the inspections are done monthly by the Plant Engineer and include checking for proper handling and storage of the materials. The checklist also states that the Manufacturing Manager will ensure employees are properly trained on the procedures in the WPP checklist. The WPP indicates the inspections will be done weekly. Martin stated, in an email dated 8/4/2022, that the inspection frequency will need to be corrected. Though Nylok isn't currently inspecting the items in the WPP weekly, as stated in the

WPP, my observations of the handling and storage of materials indicate Nylok employees are implementing the WPP on an on-going basis. I will inform Martin that Nylok is expected to conduct and document WPP inspections on a weekly basis going forward.

SC III.3 and 4 require Nylok to maintain a minimum of 0.007 inches of water pressure differential between the PTE and the adjacent area on a continuous basis and operate and maintain FG-COATINGLINEA in accordance with the current Startup, Shutdown, and Malfunction Plan (SSM) /Work Practice Plan (WPP) for the RTO, PTE and associated controlled coating lines to ensure proper operation.

During the inspection, I saw the differential pressure monitor and noted the readings I observed from the monitor were between -0.008 and -0.02 psig at about 10:35 AM. In addition, Martin provided graphs/charts of the differential pressure readings between September 2020 and May 2022 (Attachment 3). The on-site observations and charts reviewed indicate the pressure differential between the PTE and the adjacent area has been a minimum of 0.007 psig during the compliance period. The pressure differentials in the charts between September 2020 and May 2022 ranged between -0.0075 and -0.27 psig. There were dates in November 2020, January 2021, and July 2021 that the pressure readings were close to -0.007. I asked Martin to provide records of the pressure readings taken every 15 minutes, required in 40 CFR 63.3968(a)(1), for these dates. Martin provided the pressure readings taken every 7 minutes for the dates requested. The 3-hour block average readings during the operating times provided by Martin indicate the pressure differential was at least 0.007 psig.

While at Nylok, I observed SSM inspection logs hanging by the RTO monitor. These logs include the inspection checklist included in the SSM plan. Martin provided copies of the SSM Plan and checks conducted daily for July 2022 when the coating lines in FG-COATINGLINEA are being operated (Attachment 4). In addition, Martin provided employee "Record of Training" for RTO and PTE Training (Attachment 5) for 2020, 2021, and 2022.

Nylok is required, per FG-COATINGLINEA SC IV.1 - 4, to properly install, maintain, and operate the RTO, PTE and temperature and pressure monitoring devices for the RTO and PTE respectively. Proper operation of the RTO includes maintaining a minimum VOC destruction efficiency of 95 percent (by weight), a minimum combustion chamber temperature of 1,550°F and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, the permittee may use an average temperature of 1,550°F based upon a three-hour rolling average. Proper operation of the PTE includes a capture efficiency of 100% and maintaining operation at a pressure lower than the adjacent areas so that air flows into the PTE through all natural draft openings (NDOs). According to the compliance testing report provided by Martin, available online at https://www.egle.state.mi.us/aps/downloads/SRN/N5656/N5656_TEST_20210226.pdf, the RTO VOC destruction efficiency and PTE capture efficiency testing was performed on February 26, 2021. This report indicates the RTO VOC destruction efficiency was 97.8% and the capture efficiency of the PTE was 100%. The average temperature during testing, according to the report, was between 1500 F and 1600 F and the pressure differential was 0.02 inches water column. Martin provided the temperature readings taken every three minutes during the stack test (Attachment 11). The records indicate the average temperature during testing was approximately 1592 F.

During the inspection, the RTO temperature monitor displayed readings between 1608 F and 1617 F. Martin provided charts/graphs of the RTO combustion chamber temperature (Attachment 6). These charts indicate the 3-hour rolling averages for September 2020 through May 2022 were between 1600 F and 1800 F. There were dates in January 2021, April 2021, August 2021, and October 2021 that the temperature reading, not the 3-hour block average, was close to 1550 F. I asked Martin to provide records of the temperature readings taken every 15 minutes for these dates. Martin provided the temperature readings taken every 10 minutes for the dates requested. The August 18, 2021 through August 20, 2021 10 minute reading records provided by Martin (Attachment 12), indicate the 3-hour rolling averages were less than 1550 F for all 3-hour periods between 12:50 PM on August 18, 2021 and 6:50 AM August 20, 2021, except three (August 19, 2021 at 12:50 PM, 1:50 PM, and 2:50 PM), while FG-COATINGLINEA was being operated. This is a violation of FG-COATINGLINEA SC IV.1. All 3-hour block readings between 3:00 PM on August 18, 2021 and 6:00 AM August 20, 2021 were less than the average temperature during testing (1592 F). This is a violation of FG-MACT MMMM SC III.1.a, and FG-MACT MMMM SC VI.4a. A notice of violation will be issued.

The 3-hour block averages from the 10 minute temperature data for the other dates I requested (Jan. 8-12, 2021, Apr. 1-5, 2021, and October 8-11, 2021) coincided with the 3-hour averages in the temperature charts provided. I spoke with Martin on August 23, 2022 about the discrepancies between the 10-minute data and chart data provided for August 18-20, 2021. Martin stated during this conversation that he saw that the

temperatures were below 1550 F for August 18-19, 2021, was unaware of the reason the RTO was being operated below 1550 F, and that the 10-minute data provided was used to generate the charts. I was not able to replicate the chart data using the 10-minute data provided for August 18, 2021 - August 20, 2021. I did a cursory review of all dates in the temperature charts for 2021 and 2022. Based on this review, it appears there are three times per day noted on the x-axis (12 AM, 8 AM and 4 PM) for all dates except August 18-19, 2021. The times on the chart for August 18, 2021 are only 12 AM and 8 AM and for August 19, 2021 only 8 AM is noted. These are the dates the 3-hour block average was below 1550 F. According to information in an email from Martin (Attachment 13), FG-COATINGLINEA was started on August 18, 2021 and ran through 11:30 PM on August 20, 2021.

FG-COATINGLINEA SC V.1 requires the VOC content, water content, and density of any coating be determined using federal Reference Test Method 24 unless Nylok receives prior approval by the AQD District Supervisor to use manufacturer's formulation data. According to coating usage records provided, Nylok primarily uses Precote 80 and Precote 85 in the controlled lines. Martin provided a copy of the Method 24 testing report for Precote 80 and Precote 85 completed in July 2013 (Attachment 7). For all other coatings, Nylok uses SDSs to determine VOC content. I informed Nylok they should be using Method 24 or manufacturer's formulation data to determine VOC content and if they would like to use manufacturer's data, Nylok should submit a request to the AQD Warren District Supervisor.

Nylok is required, upon request of the AQD District Supervisor, to verify the VOC destruction efficiency of the RTO and capture efficiency of the enclosure (FG-COATINGLINEA SC V.2 and 3). AQD has not requested that Nylok perform performance testing, however, periodic performance testing is required in 40 CFR 63.3960 (FG-MACT MMMM SC V.1 and 2).

Martin provided the records required in FG-COATINGLINEA VI.2, 5, 6, 7, 9, and 15 used to demonstrate compliance with the emission limits, process/operational restrictions, and design and equipment parameters for FG-COATINGLINEA. Record details are discussed with the emission limit, process/operational restriction, and design/equipment parameters SCs to which they apply.

FG-COATINGLINEA VI.4 requires an alarm be installed for all control devices where a bypass can occur and records of all bypass alarms be kept. I inspected the ductwork and stack for the process and RTO during the inspection. On the ductwork leading to the RTO inlet, I observed a vent capable of opening to the ambient air. Martin stated this vent is used during startup of the RTO. I had seen a similar vent leading to the inlet of an RTO at another facility in the past. The personnel at the other facility also stated the vent is used during startup. Based on this information, this configuration appears to be standard. I was concerned this vent may be a bypass which would allow uncontrolled emissions to enter the ambient air. To better understand the purpose of this vent I did internet research. Based on my research, this vent is a process isolation damper/fresh air damper. According to the RTO manufacturer (Catalytic Products) for the RTO at Nylok (Triton); during startup the fresh air purge/idle damper opens, the booster fan is energized, the system is purged with fresh air, the burner ignites, the valves cycle, and the system is gradually brought up to the correct operating temperature. As soon as the required operating temperature is reached, the temperature safety system (TSS) enables the process lines to feed into the oxidizer, or holds the system in idle mode until production is ready. When production is ready, the fresh air purge damper closes and one or more of the diverting dampers open to draw the volatile organic compounds (VOC's) off of the process lines. I did not feel any air exiting the fresh air damper opening while the FG-COATINGLINEA was being operated.

FG-COATINGLINEA VI.3 and 8 require quarterly calibration of the RTO temperature and PTE pressure monitoring devices, quarterly visual inspections of the temperature sensor, and monthly leak checks and visual inspections of the pressure sensors. These checks are also required in MACT MMMM. Martin stated, in an email dated 8/4/2022, that the temperature sensor is checked quarterly, the pressure monitors are calibrated annually, visual inspections of the pressure sensor are conducted daily, and monthly leak checks are not currently being conducted. Martin provided records of the semi-annual inspections conducted by the RTO manufacturer (Attachment 8), quarterly thermocouple calibrations (Attachment 9), and annual pressure indicator calibrations (Attachment 9). A notice of violation will be issued to Nylok for failure to conduct pressure sensor calibrations quarterly and leak checks monthly.

Requirements pertaining to CAM data collection, monitor performance, and excursions are specified in FG-COATINGLINEA VI.10, 11, 12 and 14. The differential pressure readings provided by Martin indicate there were no CAM excursions between September 2020 and May 2022. The temperature records provided indicate there were RTO temperature excursions between August 18, 2021 and August 20, 2021. CAM reports submitted indicate there were no monitoring downtimes.

FG-COATINGLINEA VII.1-5 require semi-annual and annual deviation reporting and test reports submission. Nylok submitted the semi-annual and annual reports required in SC VII.1-3 on time between September 2020 and May 2022. Nylok reported 3 deviations occurred between January 1, 2021 - June 30, 2021. The deviations reported are for FG-COATINGLINEA SC IV.1 and IX.1 and FG-MACT MMMM SC V.1, VII.7, and IX.1. The deviation report states testing required in FG-MACT MMMM SC V.1 was conducted 1 month, 6 days late, the RTO VOC DE did not meet the minimum VOC DE required in FG-COATINGLINEA SC IV.1, and the stack test plan required in FG-MACT MMMM SC VII.7 was received 30 days late (30 days prior to the originally scheduled test date of January 29, 2021). According to the deviation report, a cracked seam in the RTO chamber caused the VOC DE to be reduced to approximately 80%. The report states the crack was repaired in accordance with the SSM plan within 24 hours of the crack being detected. The test report for the VOC DE testing conducted on the RTO for FG-COATINGLINEA on February 26, 2021 states the VOC DE was 98% during testing which is greater than the minimum VOC DE of 95% required in FG-COATINGLINEA SC IV.1. There is no record of the review of the semi-annual report for January 1, 2021 - June 30, 2021, by the AQD inspector for Nylok at the time, logged in the Michigan Air Compliance and Enforcement System (MACES). There were no other deviations and nor CAM excursion or monitoring downtime reported between September 2020 and May 2022. Nylok did not report the RTO temperature excursions between August 18, 2021 and August 20, 2021. This is a violation of FG-COATINGLINEA SC VII.5. The test report required in SC VII. 4 was received on time.

I observed, during the inspection, that the RTO stack is vertical. I did not see any visible emissions from the RTO exhaust stack. I did not measure the stack height nor exhaust diameter during the inspection. I did measure the stack height and diameter using Google Earth Pro. The Google Earth Pro stack diameter measurement is about 3 inches less than the maximum listed in the ROP and the stack height measurement is about 0.3 feet less than the minimum height in the ROP. This indicates the stack dimensions likely meet the dimensions in the ROP.

FG-COATINGLINEB

This flexible group consists of five coating lines that may use HAP-containing coatings. The coating lines in FG-COATINGLINEB are located outside of the PTE. VOC/HAP emissions from the coating lines in FG-COATINGLINEB are uncontrolled. The FG-COATINGLINEB table in the ROP contains conditions that were established pursuant to Rule 201(1)(a), including Rule 225 and Rule 702.

I inspected the coating lines comprising FG-COATINGLINEB during the inspection. All lines in FG-COATINGLINEB were being operated during the inspection. Two of the flow coating lines I observed (EU-NTQ1 and EU-PB3) had a trough, approximately 6 inches wide by 2.5 feet long, filled with liquid. Metal parts on a conveyor were dipped into the liquid. I also inspected EU-HDN1 and observed a liquid being sprayed over a trough. Parts on a conveyor passed through the liquid spray. There was a ventilation hood over each trough. I observed vapors being drawn into the hoods during the inspection.

FG-COATINGLINEB SC I.1 and 2 limit the VOC emissions per coating line to 2,000 lbs/month and 10 tons/year. The VOC emissions from all emission units in FG-COATINGLINEB combined are limited to 30 tons/year in FG-COATINGLINEB SC I.3. VOC emission records provided by Martin for September 2020 through May 2022 (Attachment 1), required in SC VI., indicate the highest monthly VOC emissions from all coating lines in FG-COATINGLINEB combined were 55 lbs occurring in December 2020. The highest 12-month rolling VOC emissions for all emission units in FG-COATINGLINEB combined were 0.14 tons reported in the 12-month period ending September 2020.

Nylok, per SC III.1 and 2, is required to capture all waste materials and store all waste and HAP/VOC containing materials in closed containers. During the inspection, all of the waste, coating, and solvent product containers that I observed were covered.

Per S.C. V.1, requires the VOC content, water content, and density of any coating be determined using federal Reference Test Method 24 unless Nylok receives prior approval by the AQD District Supervisor to use manufacturer's formulation data. According to coating usage records provided, Nylok primarily uses Nytorq and Top 300 in the uncontrolled lines. SDSs are used for VOC content data. I informed Nylok they should be using Method 24 or manufacturer's formulation data to determine VOC content and if they would like to use manufacturer's data, Nylok should submit a request to the AQD Warren District Supervisor.

Martin provided the records required in FG-COATINGLINEB Section VI of the ROP, used to demonstrate compliance with the emission limits for FG-COATINGLINEB. Record details are discussed with the emission limit SCs to which they apply.

FG-COATINGLINEB VII.1-3 require semi-annual and annual deviation reporting and test reports submission. Nylok submitted the semi-annual and annual reports required in SC VII.1-3 on time between September 2020 and May 2022. No deviations from FG-COATINGLINEB requirements were reported between September 2020 and May 2022.

I did not inspect the stacks for the emission units in FG-COATINGLINEB during the inspection to verify compliance with FG-COATINGLINEB SC VIII.1-2.

FG-MACT MMMM

This flexible group contains conditions from 40 CFR Part 63, Subpart MMMM applicable to FG-COATINGLINEA and FG-COATINGLINEB. The coating lines in FG-MACT MMMM are regulated as an existing affected source because construction of this miscellaneous metal parts and products surface coating facility commenced prior to August 13, 2002 according to AQD permit application data and information provided by Nylok. Nylok determines its emission rate for all coating lines in FG-MACT MMMM via the Emission Rate With Add-On Controls Option per 40 CFR 63.3961(a) (S.C. I.2.c). 40 CFR 63.3961(a) states, in part, "You may use the emission rate with add-on controls option for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. You may include both controlled and uncontrolled coating operations in a group for which you use this option."

FG-MACT MMMM SC I.1 - 5 limit the Existing –General Use Coating organic HAP emissions to 2.6 lbs per gal of coating solids used per 12-month rolling time period as determined at the end of each calendar month. The emission limit applies at all times except during periods of startup, shutdown, and malfunction. According to the ROP, compliance with emission limit is demonstrated through periodic testing of the RTO and PTE required in FG-MACT MMMM SC V.1 and 2, and monitoring and recordkeeping in FG-MACT MMMM Section VI.1 - 10.

According to the compliance testing report provided by Martin and available online at https://www.egle.state.mi.us/aps/downloads/SRN/N5656/N5656_TEST_20210226.pdf, RTO VOC destruction efficiency and PTE capture efficiency testing, required in FG-MACT MMMM SC V.1 and 2, was performed on February 26, 2021. This report indicates the RTO HAP destruction efficiency was 97.8% and the capture efficiency of the PTE was 100%.

Organic HAP emissions records provided by Martin for September 2020 through May 2022 (Attachment 10), required in SC VI. 3, indicate the highest 12-month rolling organic HAP emissions from FG-MACT MMMM were 0.2 lbs/gal of coating solids, occurring every 12-month period between September 2020 and May 2022.

Compliance with the requirements in FG-MACT MMMM SC III.1-5 and SC IV.1 were addressed in FG-COATINGLINEA SC III.1 - 4 and SC IV. 1 - 4.

FG-MACT MMMM SC VI.1 - 3 specify HAP emissions recordkeeping and HAP emission calculation requirements for initial and continuous compliance with the HAP emission limit in SC I.1. According to coating usage records provided, Nylok primarily uses Precote 80 and Precote 85 in the controlled lines. Nylok uses SDSs to determine HAP content of coatings, reducers, and clean up solvents. The records indicate Nylok is using the formulas in MACT MMMM to calculate HAP emissions. The SDSs indicate toluene is the only HAP in the materials used at Nylok.

Compliance with the applicable requirements in FG-MACT MMMM SC VI.4 - 10 and SC VII. 1 - 9 were addressed in FG-COATINGLINEA.

FG-MACT MMMM SC VII.1-10 contain semi-annual and annual Title V and MACT reporting, including a requirement to report when an operating parameter is out of the allowed range (SC VII.6.b). Nylok has been submitting these records on time. The deviations reported are noted in FG-COATINGLINEA Section VII.1-5. Nylok did not report the temperature deviation discussed in FG-COATINGLINEA SC IV.1-4. This a violation of FG-MACT MMMM SC VII.6.b. A notice of violation will be sent.

PARTS WASHER

The facility has one natural-gas heated conveyerized parts washer on site. The parts washer has a stack leading to ambient air. Martin stated only a few parts are washed in the machine. I saw an ArmaKleen MM Recycle label on the parts washer during the inspection. I reviewed the SDS for ArmaKleen MM-Recycle Concentrate. According to the SDS, the product is mostly water (71-79%) and contains 1-5% 2-Propanol, 1-(2-butoxy-1-methylethoxy) (also known as DI(PROPYLENE GLYCOL) BUTYL ETHER), which may be a VOC. Though EPA's list of HAPs includes glycol ethers; according to the Toxics Release Inventory - List of Toxic Chemicals within the Glycol Ethers Category, published by EPA, the glycol ethers category "does not contain glycol ethers based on propylene glycol, dipropylene glycol, or tripropylene glycol." The requirement of Rule 201(1), to obtain a permit to install, does not apply to aqueous based parts washers per Rule 281(2)(k). According to Rule 101(q), an aqueous based parts washer means a tank containing liquid with a volatile organic compound content of less than 5%, by weight, and at a temperature below its boiling point that is used to spray, brush, flush, or immerse metallic and/or plastic objects for the purpose of cleaning or degreasing.

CONCLUSION

Based on the AQD inspection and records review, Nylok operated FG-COATINGLINEA when the RTO 3-hour rolling and block average temperatures were less than 1550 F, did not conduct accuracy audits and leak checks of the pressure sensor according to the schedule/as required in FG-COATINGLINEA SC VI.8/FG-MACT MMMM SC VI.4, and did not report the RTO temperature deviations/excursions. A notice of violation will be issued for FG-COATINGLINEA SC IV.1, FG-COATINGLINEA SC VI.8, FG-COATINGLINE SC VII.5, FG-MACT MMMM SC III.1, FG-MACT MMMM SC VI.4 and FG-MACT MMMM SC VII.6.b.

NAME



DATE

8/26/2022

SUPERVISOR

