

DEPARTMENT OF ENVIRONMENTAL QUALITY
 AIR QUALITY DIVISION
 ACTIVITY REPORT: Scheduled Inspection

P029332541

FACILITY: ETERON INC.		SRN / ID: P0293
LOCATION: 23944 FREEWAY PARK DRIVE, FARMINGTN HLS		DISTRICT: Southeast Michigan
CITY: FARMINGTN HLS		COUNTY: OAKLAND
CONTACT: Don Stumpf, Director of Quality		ACTIVITY DATE: 12/15/2015
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On Tuesday, December 15, 2015, I conducted an annual inspection at Eteron Incorporated located at 23944 Freeway Park Drive, Farmington Hills, Michigan. The purpose of the inspection was to verify facility's compliance with requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994, State of Michigan, Department of Environmental Quality (MDEQ), Stipulation for Entry of Final Order by Consent, AQD No. 13-2015, and Permits to Install (PTI) No. 9-12, and 90-14A.

I arrived at the facility at about 9:15 AM. At the facility I met Mr. Don Stumpf, Director of Quality. I introduced myself and stated the purpose of the inspection. I provided him the MDEQ Brochure for DEQ Environmental Inspections: Rights and Responsibilities. During the pre-inspection meeting, he explained his facility's operations. The facility started operations in 2001. They have 85-90 employees, operates two shifts per day (6:30 AM-2:30 AM, five days (Monday-Friday) and 1 shift on Saturday per week.

The facility is mainly involved in the flocking (fiber coating) of internal automotive components such as glove boxes, storage areas and other internal compartments for automotive manufacturers such as GM, Chrysler, Ford, Nissan, BMW, etc. The parts are coated with adhesive followed nylon fiber coating. The coated parts are then dried in natural gas fired ovens. Mr. Stumpf told me that they don't use any cleaner to clean the parts before coating. The facility uses lacquer thinner to clean tools (wiped).

The facility mostly flocks plastic internal components. The plastic parts are adhesive coated and flock applied in separate coating booths. Once or twice in a year it also flocks metal parts such as metal clips. They make coat about 50,000-60,000 parts per year and uses about 10 gallons of coating. This is done in an enclosed clip line (Grommet Line). They use two parts epoxy coating for metal parts. This process could be subject to 40 CFR 63, Subpart MMMM-NESHAP for Surface Coating of Miscellaneous Metal Parts and Products. He told me the last time they haven't done this process since 2013. If they do it, they would separate records for the usage and the exhaust emissions from the booth would be vented to the newly installed thermal oxidizer. They only use one type of coating for this process.

Mr. Stumpf informed me that they don't currently perform parts coating for industrial business machines. But they want to have the flexibility to make these parts if needed. They haven't done any business machine parts coating since 2012. This process would be subject to 40 CFR 60, Subpart TTT- Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines.

The adhesive coating is conducted in coating booths equipped with particulate control filters. Facility has 12 adhesive coating booths plus 1 adhesive application for the clip line and 5 flocking booths plus 1 flocking application in the clip line. Clip line booths and oven are in one single unit. Each coating booth has individual stack. The overspray from the flock coating booth is collected using a cyclone and sock filter bags. The collected powder (flock) is reused. The exhaust from the bags is vented in to the general in-plant area. The facility has two natural gas fired dryer ovens of 500,000 BTU/hr each.

During the meeting we discussed the PTI No. 9-12, PTI No. 90-14A and the Consent Order AQD No.13-2015.

PTI No. 9-12:

The facility operates the burn off oven during the second shift at about 10 PM. They operate the burnoff oven every day or 2-3 days per week. They use it to burn off cured adhesives and fiber parts from metal masks used during adhesive coating of parts. It was not operated during time of my inspection. I could not verify visible emissions from the oven. The burn off oven only uses natural gas as fuel. Mr. Stumpf told me that the oven is equipped with a secondary burner. The oven is equipped with two thermometers. They keep records of the temperatures. I suggested installing a chart recorder to verify operating temperatures because I was never able to verify the operating parameters during my inspections. He agreed to look into my suggestion. Mr. Stumpf told me that the thermometers are calibrated. The facility is keeping information for the chemical composition of the materials used in the booths.

Consent Order AQD No. 13-2015

Compliance Program and Implementation Schedule:

Condition 9: A-Permit

1. Upon the issuance of the PTI No. 90-14A, the Company shall fully comply with the permit, any subsequent revisions. Compliance with PTI No. 90-14A will be discussed during permit compliance discussion later in this report.
2. Within forty-five days of the issuance of the PTI No. 90-14A, the Company shall submit an administratively complete ROP application to MDEQ. Upon the issuance of the ROP, the Company shall fully comply with the RO permit. The company hasn't submitted the ROP application. He informed me that they were waiting to complete the RTO performance testing and verify that the facility is in compliance with the MACT standards before they submit the ROP application. I informed him they could submit ROP application before they tested the RTO and that they are in violation of this requirement of the Consent Order.

B-National Emission Standards for Hazardous Air Pollutants

1. Within 120 days of the effective date of the Consent Order, the Company shall submit a Notification of Compliance Status to the Environmental Protection Agency Region 5 pursuant to the NESHAP for Surface Coating of Plastic Parts and Products and NESHAP for Surface Coating of Miscellaneous Metal Parts and Products. The company has submitted the initial notifications for both NESHAPs to EPA Region 5 on November 25, 2014. The facility has not submitted the Notification of Compliance Status yet. I told him that it is a violation of this requirement of the Consent Order. On December 16, I emailed Subpart PPPP requirements and website link to the rule.
2. Within 120 days of the effective date of this Consent Order, the Company shall comply with all applicable requirements of the NESHAP for Surface Coating of Plastic Parts and Products and the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products. The effective date of this Consent Order is April 28, 2015. The company has not submitted information regarding compliance with these requirements. The compliance with this requirement will be discussed further in the PTI No. 90-14A compliance evaluation.

PTI No. 90-14A

EU-COATINGLINE

Section 1-Emission Limits:

SC I.1-VOC is limited to 10.4 tons per year calculated based on a 12-month rolling time period as determined at the end of each calendar month. This limit is applicable on and after April 1, 2015.

SC I.1-Mixed Xylene (CAS No. 1330-20-07) is limited to 63.6 pounds per day based on a calendar day. This limit is applicable on and after April 1, 2015. The facility neither provided adhesive usage nor emission calculations to compliance with these emission limits. So compliance was not verified.

SC II.1- requires that the permittee recover and reclaim, recycle, or dispose of all adhesives (material), in accordance with all applicable regulations. Mr. Stumpf told me that the operators pour back any unused adhesives to the storage containers.

SC II.2- requires the permittee to capture all waste materials and shall store them in closed containers and to dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. He told me that the adhesives are poured back in to the storage containers and waste if any is stored in covered containers. I observed that floc fibers are collected on the floor. I informed him that they need to have better collection for the floc fibers; otherwise, it would become fugitive dust and cause complaints from the neighbors. He agreed to clean up the floor.

SC II.3 requires the permittee to dispose spent filters in a manner which minimizes the introduction of air contaminants to the outer air. He told me that the spent filters are discarded in the trash bins.

SC II.4 requires that the permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. The waste adhesives are stored in closed containers and I observed that floc fibers are collected on the floor. I informed him that they need to have better collection for the floc fibers; otherwise, it would become fugitive dust and cause complaints from the neighbors. He agreed to clean up the floor.

SC II.5 requires that the permittee shall not operate EU-COATINGLINE unless a malfunction abatement plan (MAP) as described in Rule 911(2) for the regenerative thermal oxidizer (RTO), has been submitted within 90 days of permit issuance, and is implemented and maintained. The special condition further details the contents of the MAP. The facility has not submitted a MAP for the RTO. I informed him that the special condition details the contents of the MAP. On December 21, 2015, I emailed him Rule 912 which details the contents of the MAP. I informed him that the company is in violation of this condition.

SC IV.1 requires that the permittee shall not operate EU-COATINGLINE unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. During inspection I observed that the exhaust filters are installed in coating booths. In couple of booths I observed that the filters were not in place. I notified him of that and he had corrected immediately.

SC IV.2 – requires that the permittee shall equip and maintain each booth portion of EU-COATINGLINE with HVLP applicator or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. He told me that the facility is using appropriate HVLP applicator for adhesive coating.

SC IV.3 requires that on and after April 1, 2015, the permittee shall not operate EU-COATINGLINE unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC capture efficiency of 95 percent (by weight), a minimum VOC destruction efficiency of 95 percent (by weight), a minimum retention time of 0.5 seconds, a minimum combustion temperature of 1400°F, and in accordance with the MAP required in SC III.5. He informed me that a refurbished RTO was installed on March 30, 2015 by Woo Neil Contractors. A temperature monitor/recorder is not installed, so the operating temperature could not be verified. He informed me that performance testing is not done. So the destruction efficiency could not be verified. He agreed to contact the contractor to verify the residence time and provide the calculation for it. I sent an email on December 22 reminding him about the residence time calculation. I informed him that the facility is in violation of this condition.

SC IV.4 requires that the permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the thermal oxidizer to monitor the

temperature on a continuous basis during operation of any portion of EU-COATINGLINE. He informed me that a temperature monitor is not installed. He inquired about the type of recordkeeping of the temperature. I reiterated the condition and told him that the temperature has to be monitored continuously. The monitor recordkeeping could be electronic or chart recorder, but preferably electronic. He told me that they are capable of installing electronic recorder. I informed him that the facility is in violation of this requirement.

SC V.1 requires that the permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.

He informed me that the facility has not done any US EPA Method 24 analysis of the coatings to determine VOC content. The facility uses the coatings as received. They use mostly three adhesive coatings (two solvent based 1307 & 1571 and one water based 1341). He indicated that the adhesive supplier may be conducting the VOC testing and the supplier's contact information. I contacted the supplier, Jason Hulbert, NYATEX Adhesive & Chemical Co. at 517 546 4046. Mr. Hulbert informed me that they don't conduct Method 24 VOC content analysis either, but provided the MSDS, technical data sheets and HAP content information for these three coatings. On Thursday, December 17 I sent an email to Mr. Stumpf detailing how to send the request to the district supervisor requesting to use formulation data in lieu of Method 24 analysis.

SC V.2 requires that within 180 days from April 1, 2015, the permittee shall verify, by testing at the owner's expense and in accordance with Department requirements, the capture efficiency and destruction efficiency of the RTO for the EU-COATINGLINE. The permittee must complete the testing once every five years, thereafter. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. Verification of the destruction efficiency includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. He informed me that they haven't conducted the performance testing (capture efficiency and destruction efficiency) for the RTO. They had hired some consultant to do the testing, but it did not finalize. He requested information regarding consultants. So on Monday, December 21, I emailed him the list of Environmental Consultants published in the MDEQ Website. I informed him that the facility is in violation of this requirement.

SC VI.1 requires that the permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. The facility is required to calculate the emission limits specified in SC I.1 & 2, but has not completed the calculations as required. So the compliance verification for these limits could not be done. I informed him that the facility is in violation of this requirement.

SC VI.2 requires that the permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. The facility is keeping the current listing and other information related to each material.

SC VI.3 requires that on and after April 1, 2015, the permittee shall monitor and record, in a satisfactory manner, the temperature in the combustion chamber of the RTO on a continuous basis, during operation of EU-COATINGLINE. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request. The facility has not installed a monitor, and hence no record of the combustion chamber temperature. I reminded him of this requirement and agreed to install a temperature monitor and continuous recorder. I informed him that the facility is in violation of

this requirement.

SC VI.4 requires that on and after April 1, 2015, the permittee shall keep the following information on a calendar month basis for EU-COATINGLINE:

- a. Gallons (with water) of each material used.
- b. VOC content (with water) of each material as applied.
- c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month using mass balance or an alternate method acceptable to the AQD District Supervisor.
- d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month using mass balance or an alternate method acceptable to the AQD District Supervisor.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. He informed me that the facility is keeping the usage records, but has not keeping emission calculation records. I informed him that the facility is in violation of this requirement.

SC VI.5 requires that on and After April 1, 2015, the permittee shall keep the following information on a calendar day basis for EU-COATINGLINE:

- a. Gallons (with water) of each mixed xylene (CAS No. 1330-20-07) containing material used.
- b. Where applicable, gallons (with water) of each mixed xylene (CAS No. 1330-20-07) containing material reclaimed.
- c. The mixed xylene (CAS No. 1330-20-07) content (with water) in pounds per gallon of each material used.
- d. Mixed xylene (CAS No. 1330-20-07) mass emission calculations determining the daily emission rate in pounds per calendar day.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. He informed me that the facility has not been keeping the above records. The facility is not reclaiming any materials. I informed him that the facility is in violation of this requirement.

SC VIII.1 requires that the SV-RTO stack dimensions be 21.0 inches maximum exhaust diameter and 48 feet minimum height above ground. He was not sure about whether the actual dimensions meet the required dimensions. So he had someone measure the dimensions. The measured dimensions were Height = 35½ feet above ground; Exhaust Diameter = 24". He informed me that stack connected to the RTO is 21" as required, but the annual rain sleeve is 24". I informed him the facility is in violation of the permit conditions and that I would talk to the AQD permit section to verify that the actual stack dimensions would satisfy the modelling requirements. If so, they could modify the permit to show the actual stack dimensions. If not, they have to change the stack dimensions. On Tuesday, December 22, after discussing this issue with AQD Permit Engineer, Vrejesh Patel, I emailed the company requesting that they verify their compliance using SCREEN3 or better modelling tools.

SC IX.1 requires that the permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart Mmmm for surface coating of miscellaneous metal parts and products. He told me that the facility has not performed metal coating since 2013, so the compliance was not verified.

SC IX.2 requires that the permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart Pppp for surface coating of plastic parts and products. The compliance will be discussed in the FG-MACT-PPPP.

SC IX.3 requires that the permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS), as specified in 40 CFR Part 60, Subpart TTT for Standards of

Performance for Industrial Surface Coating: Surface Coating of Plastic Parts of Business Machines. He told me that the facility has not performed surface coating of plastic parts of Business Machines since 2012. So the compliance was not verified.

SC IX.4 requires that on and after April 1, 2015, the permittee shall label the each emission unit according to a method acceptable to the AQD District Supervisor. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. He informed me that they had labelled each emission units.

FG-MACT-PPPP

SC 1 limits organic HAP emissions to 0.16 lb per lb of coating solids based on a 12-month rolling time period as determined at the end of each calendar month for this general use coating. The facility had elected to verify compliance with this emission limit using SC 2c- Emission rate with add-on controls option. The compliance with SC 1 was not verified because the performance testing for the control equipment was not conducted or the calculations to show compliance with any other available option were not performed. I informed him that the facility is in violation of this requirement.

SC III.1 requires operation of the control equipment based on the operating limits established during performance test which has not been conducted. I informed him that the facility is in violation of this requirement. We discussed about the capture efficiency test for the process units. I informed him that they need to establish parameters to verify continuous compliance with capture efficiency. We also discussed the option of installing of permanent total enclosure (PTE). I provided information about MDEQ Environmental Assistance Center-RETAP which may be able to help them with PTE design.

SC III.2 requires that for any coating operations using the emission rate with add-on controls option, the permittee shall develop and implement a work practice plan to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operations. The requirement also specifies the content of the work practice plan. The facility has not developed this plan. I informed him that the facility is in violation of this requirement.

SC III.3 requires that the permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3). This SSMP must address the startup, shutdown and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The SSMP must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures. The facility has not developed a SSMP. I informed him that the facility is in violation of this requirement.

SC III.4 requires that permittee shall be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.4492 at all times except during periods of startup, shutdown, and malfunction. The facility has not established the operating limits for the control system, so compliance was not verified.

SC III.5 requires that the permittee shall be in compliance with the work practice standards in 40 CFR 63.4493 at all times. I did not observe any open containers containing solvents or adhesives. The facility appears to be compliance with this requirement.

SC IV.1 requires that the permittee shall not operate FG-MACT-PPPP unless the control device is installed, maintained, and operated in a satisfactory manner. I observed that the control device which an RTO, is installed and operating. The operating temperature, capture efficiency, destruction efficiency, etc. were not verified. So compliance is not verified.

SC V.1 requires that the permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the density of each material used in accordance with 40 CFR 63.4541, 40 CFR 63.4551, and/or 40 CFR 63.4561. These three sections demonstrates how to show compliance with emission limitations for facilities using compliant material option, emission rate without add-on controls option, and emission rate with controls option, respectively. This facility elected to use compliant material for the adhesive coating process which uses only water based adhesive and emission rate with control option for coating process which uses solvent based adhesive.

40 CFR 63.4561(e) details how to determine the mass fraction of organic HAP, density, volume used, and mass fraction of coating solids. It requires the facility to follow the procedures specified in 40 CFR 63.4551(a) through (d) to determine the mass fraction of organic HAP, density, and volume of each coating, thinner and/or other additive, and cleaning material used during each month; and the mass fraction of coating solids for each coating used during each month.

40 CFR 63.4551(a)-Determine the mass fraction of organic HAP for each material. Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.4541(a) which allows the facility to US EPA Method 311, US EPA Method 24 or information from the supplier or manufacturer of the material. The facility chose to use technical data sheet information for each coating to determine its organic HAP content.

40 CFR 63.4551(b)-Determine the mass fraction of coating solids. Determine the mass fraction of coating solids (kg (lb) of coating solids per kg (lb) of coating) for each coating used during each month according to the requirements in 40 CFR 63.4541(b) which allows the facility to US EPA Method 24 or information from the supplier or manufacturer of the material. The facility chose to use technical data sheet information for each coating to determine mass fraction of coating solids for each coating.

40 CFR 63.4551 (c)-Determine the density of each material. Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. The facility chose to use technical data sheet information for each coating to determine the density of each liquid coating, thinner and/or other additive, and cleaning material used.

40 CFR 63.4551(d)- Determine the volume of each material used. Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. He informed me that they are keeping records of the volume of each coating they used.

SC V.2 requires that the permittee shall conduct each performance test required by 40 CFR 63.4560 according to the requirements in 40 CFR 63.7(e)(1) and under the conditions in 40 CFR 63.4564(a)(1) and (2), unless a waiver of the performance test is obtained in accordance with 40 CFR 63.7(h). The facility agreed to conduct the performance test as required.

SC V.3 requires that the permittee shall conduct each performance test of the emission capture system and add-on control device to determine capture efficiency and emission destruction or removal efficiency, according to the requirements in 40 CFR 63.4565 and 40 CFR 63.4566. The facility agreed to conduct the performance test as required.

SC VI.1 requires that the permittee shall conduct a compliance demonstration according to the requirements in 40 CFR 63.4541, 40 CFR 63.4551, or 40 CFR 63.4561. See discussion under SC V.1.

SC VI.2 requires that the permittee shall keep all records required by 40 CFR 63.4530 in the format and timeframes outlined in 40 CFR 63.4531. The facility has not started keeping proper records to show compliance with 40 CFR 63.4530 requirements. I informed him the facility is in violation of this

condition.

SC VI.3 requires that the permittee shall maintain, at a minimum, the following records for each compliance period:

- a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart PPPP, and the documentation supporting each notification report. The facility has not submitted any notification yet to USEPA/MDEQ other than initial notifications.
- b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. Facility is keeping these records.
- c. A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. If the HAP content of the water based adhesive is less than 0.16 lb organic HAP per pound of coating solids, the facility could use "Compliant Coating" option. For the coating process using solvent based coating, the facility could use "emission rate with add on control" option. The facility has not started showing compliance with the emission limits or started keeping the records. I informed him that the facility is in violation of this requirement.
- d. For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 1 of 40 CFR 63.4541. See SC VI.3c discussion.
- e. For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.4551; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of 40 CFR 63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.4551. See SC VI.3c discussion.
- f. For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.4530(c)(4) (i) through (v). See SC VI.3c discussion.
- g. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the mass used. The facility is keeping these records.
- h. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period. The facility needs to start keeping these records as part of its compliance demonstration.
- i. The mass fraction of coating solids for each coating used during each compliance period. The facility needs to start keeping these records as part of its compliance demonstration.
- j. The information specified in 40 CFR 63.4530(g)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.4551(e)(4).
The facility is not claiming an allowance for organic HAP contained in the waste materials.
- k. The date, time, and duration of each deviation. Facility needs to start keeping these records.
- l. For the emission rate with add-on controls option, records specified in 40 CFR 63.4530(i)(1) through (8). The facility needs to start keeping these records.

SC VI.4 requires that the permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 to 40 CFR Part 63, Subpart PPPP using the applicable method(s) described in this

condition. The facility has not demonstrated initial compliance yet. Compliance with this requirement will be verified later.

SC VI.5 requires that the permittee shall demonstrate continuous compliance with the emission limit in 40 CFR 63.4490, for each compliance period, using Equation 1 of 40 CFR 63.4541 when using compliant coating option. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.4541(a). The exhaust from the processes that use water based coating is not vented to the control equipment. Facility may use this option if the HAP content of the water based adhesive is less than 0.16 lb organic HAP per pound of coating solids.

SC VI.6 requires that for any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.4490, for each compliance period according to 40 CFR 63.4551(a) through (g). The facility currently does not intend to use this option to show compliance.

SC VI.7 requires that for any coating operations using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit, for each compliance period according to the procedures in 40 CFR 63.4561. The facility has not demonstrated compliance yet, but intent to use this option.

SC VI.8 requires that during the performance test required by 40 CFR 63.4560, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.4567 to establish the emission capture system and add-on control device operating limits required by 40 CFR 63.4492. . The facility has not conducted performance test, but intent to perform the applicable monitoring and recordkeeping.

SC VI.9 requires that for any coating operations using the emission rate with add-on controls option, the permittee shall install, operate, and maintain each Continuous Parameter Monitoring System (CPMS) according to the requirements of 40 CFR 63.4568(a). If the capture system contains a bypass line, the permittee shall comply with the requirements of 40 CFR 63.4568(b). The facility has not installed CPMS for combustion temperature monitoring, capture system monitoring, etc. I informed him that the facility is violation of this requirement.

SC VI.10 requires that the permittee must apply to the USEPA for approval of alternative monitoring under 40 CFR 63.8(f), if using an add-on control device other than those listed in Table 1 of 40 CFR Part 63, Subpart PPPP, or to monitor an alternative parameter and comply with a different operating limit. The facility does not intend to use alternative monitoring or control equipment.

SC VII.1 requires that for the compliant material option, the use of any coating, thinner or cleaning material which does not meet the criteria specified in 40 CFR 63.4542(a) is a deviation that must be reported as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(5). The compliance with emission limit has not been demonstrated, so deviations has not been identified or reported.

SC VII.2 requires that for the emission rate without add-on controls, if the organic HAP emission rate for any compliance period exceeds the applicable emission limit specified in 40 CFR 63.4490, the permittee shall report this as a deviation as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(6). The facility is not using this option.

SC VII. 3 requires that for the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.4510(c)(6) and 40 CFR 63.4520(a)(7):

- a. The organic HAP emission rate for any compliance period exceeds the applicable emission limit specified in 40 CFR 63.4490; (40 CFR 63.4563(b))
- b. An operating parameter is out of the allowed range; (40 CFR 63.4563(c)(1))

- c. Any control system by-pass line, for which liquid-liquid material balances are not carried out, is opened; (40 CFR 63.4563(d))
- d. Deviations from work practice standards occur. (40 CFR 63.4563(e))

The compliance with emission limit using this option has not been demonstrated, so deviations has not been identified or reported.

SC VII.4 requires that the Permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.4510. The facility has not submitted any notifications. I informed him that the facility is in violation of this requirement.

SC VII.5 requires that the permittee shall submit all semiannual compliance reports as required by 40 CFR 63.4520. Each semiannual compliance report shall identify which coating operations used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.4490, include a statement that the coating operations were in compliance. This facility which was an area source that increased its emissions such that it becomes a major source of HAP emissions, the compliance date is specified in 40 CFR 63.4483(c)(2) which states the compliance date is the date 1 year after the area source becomes a major source or 3 years after April 19, 2004, whichever is later. Based on the emission calculations during previous inspections the source became a major source in January 2012. The initial compliance period starts February 1, 2012 through January 31, 2013.

40 CFR 63.4520(a)(i) requires that the first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period and ends on June 30, 2013.

40 CFR 63.4520(a)(ii) requires that each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

40 CFR 63.4520(a)(iii) requires that each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

40 CFR 63.4520(a)(iv) states if the facility is subject to Title V permit (ROP) the facility may submit the first and subsequent compliance reports according to the dates the Title V (ROP) permit has established instead of according to the date specified in 40 CFR 63, Subpart 4520(a)(iii).

This facility is subject to Title V permit requirements. The facility was issued MDEQ-AQD Consent Order Number AQD No. 13-2015 with effective date of April 28, 2015 for violations of NESHAP, R336.1201, and Title V requirements. Permit to Install No. 90-14A, approved on March 12, 2015, requires the installation of control equipment (RTO) as of April 1, 2015. The PTI is part of the consent order. Therefore, based on 40 CFR 63.4520(a)(iv), the new initial compliance period is April 1, 2015 through March 30, 2016 and first semi-annual report should cover April 1, 2016 through June 30, 2016 and must be postmarked or delivered no later than July 31 to MDEQ-AQD and USEPA Region 5 offices. Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Each semiannual compliance report must be postmarked or delivered to both offices no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

If a Title V Permit (ROP) was issued, the compliance reports can be submitted according to the dates this permit has established instead of according to the date specified above.

SC VII.6 requires that for any coating operation(s) using the emission rate with add-on controls option, the permittee shall submit all performance test reports for emission capture systems and add-on control devices. The facility has not conducted performance tests. The facility will be notified of this deviation.

SC VII.7 requires that if the emission rate with add-on controls option is used and a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit a SSM report as specified 40 CFR 63.4520(c). The facility has not notified AQD of any malfunctions of the control equipment.

SC IX.1 requires that the permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart PPPP for Surface Coating of Plastic Parts and Products. The facility appears to be in violation of this requirement as discussed in above sections. The facility will be notified of these deviations.

FG-MACT-MMMM- National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart MMMM for surface coating of miscellaneous metal parts and products. He told me that the facility has not performed metal coating since 2013, so the compliance was not verified.

FG-NSPS-TTT- New Source Performance Standards (NSPS), as specified in 40 CFR Part 60, Subpart TTT for Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts of Business Machines. He told me that the facility has not performed surface coating of plastic parts of Business Machines since 2012. So the compliance was not verified.

After the pre-inspection meeting, he accompanied me for an inspection of the facility. I observed that all of the adhesive booths and floc booths were operating. The filters in most of the booths were in place. In couple of booths the filters were not in place. I notified him of that, and he had the filters put in place. He told me that the filters are replaced 2-3 times per day.

The booths are labelled as:

Manual Line Spray Booth 1, Menden Line Flock Booth 1,
New Manual Line Flock Booth 1, New Manual Line Spray Booth 1
New Automatic Line 1 Spray Booth 1 (Water Based, not vented to RTO)
New Automatic Line 1 Spray Booth 2
New Automatic Line 2 Spray Booth 1
New Automatic Line 2 Spray Booth 2

Regular Automatic Line 1 Spray Booth 1
Regular Automatic Line 1 Spray Booth 2

Regular Automatic Line 2 Spray Booth 1
Regular Automatic Line 2 Spray Booth 2 (Water Based, not vented to RTO)

All these are connected to a header which is connected to the RTO.

Small Conveyor Line Flock Booth
Small Conveyor Line Spray Booth

Menden Line Spray Booth 1
Menden Line Spray Booth 2

Menden Line Flock Booth 1
Menden Line Flock Booth 2

Also inspected the Curing Oven (heated to 200oF, Not Controlled. The Menden Line booths are connected to this oven. I informed him that the emissions from this oven need to be controlled. I also observed that the other curing oven has two vents. One of them is connected to the RTO and other vent is open ended. I advised him to either connect that vent to the RTO or remove it if not necessary.

He accompanied me to the RTO. It was operating at the time of the inspection. An operator switched the fuel feed to natural gas and opened the vent to allow atmospheric air. Mr. Stumpf explained that the employees are on break time and parts were not being coated with adhesive at that time, so no VOC vented to the RTO. I informed him that the fuel switch has to be secured, so no one accidentally turn it and

have the booth emissions vented uncontrolled. He agreed to look into that. I also advised him that the atmospheric makeup air has to be filtered; otherwise, the dust in the air may ruin the RTO beds. I did not observe any visible emissions from the stack.

While inspecting the RTO I also observed that the motor shaft for the RTO fan was open and could pose danger to someone standing by. I notified this to Mr. Stumpf and he agreed to install a shaft guard for safety. I also observed accumulated flock dust inside the building. I advised him of good housekeeping to control the dust which could become fugitive and cause dust complaints. He agreed to control the dust.

During post inspection meeting I informed him of the possible violations of the consent order, the PTI and the MACT requirements. He agreed to comply with those requirements.

Conclusion: The facility appears to be violation of the requirements of Stipulation for Entry of Final Order by Consent, AQD No. 13-2015, Permits to Install (PTI) 90-14A and NESHAP Subpart P requirements. A Notice of Violation will be sent to the facility seeking compliance with the requirements.

NAME Sebastian Y Kallamkal

DATE 1/5/16

SUPERVISOR

CJE