

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Romeo RIM, Inc.	SRN : B5854
Location : 74000 Van Dyke Avenue	District : Southeast Michigan
	County : MACOMB
City : ROMEO State: MI Zip Code : 48065	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Sebastian Kallumkal
FCE Begin Date : 9/1/2012	FCE Completion Date : 9/25/2014
Comments : Based on inspection and records review, the facility appears to be not in compliance with applicable requirements.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/17/2014	Scheduled Inspection	Non Compliance	Onsite Inspection
09/11/2014	ROP Semi 1 Cert	Compliance	Booths 3 and 4 not been used- No carbon filter change for the carbon adsorption unit- Compliance Did not change filter for RIM 43 for 3 days. Found out and changed filters. Compliance.
09/11/2014	MACT (Part 63)	Compliance	MACT Subpart P PPP 1st Half Semi-Annual compliance report (emission rate w/o add-on controls): During the reporting period, all monitoring and associated recordkeeping requirements in the ROP (FG-MACT) were met. No deviations from these requirements or any other terms or conditions occurred.
05/21/2014	MAERS	Compliance	Reviewed and uploaded.
05/16/2014	ROP Other	Compliance	Installation of Exempt "Mold Splitter" Equipment at Romeo Rim, Inc. Reviewed.
05/14/2014	Reg. Applicability Determination	Compliance	Facility submitted Rule 290 and Rule 285(c)(iii) determinations for the installations of a splitter for mold cleaning and using the mold splitter instead of EU-PLT1-IMP26 and EU-PLT1-IMP28 while their computer systems are upgraded.

Activity Date	Activity Type	Compliance Status	Comments
04/10/2014	Telephone Notes	Compliance	Conference Call with Paul Barick and Teresa Reinwasser of Romeo RIM & Cathy Jo Simon, Consultant. They want to inform about the installation of a mold splitter which would be used for splitting and cleaning the molds using dry ice. They also want to upgrade the computer system for EU-PLT1-IMP26 and EU-PLT1-IMP28 at different times and use the mold splitter to produce parts while these RIMs are down. They want to use the exemption rule R285(c)(iii) for this equipment change. No change in process, production rate, or emissions. Told them AQD does not approve exemptions, but the rule appears to be suitable. Requested them to send a letter to Chris Ethridge regarding this change.
03/31/2014	ROP SEMI 2 CERT	Compliance	Deviations corrected and corrective actions acceptable. Compliance.
03/28/2014	ROP Other	Compliance	MAERS Certification-Signed Supporting documents for MAERS Report.
01/16/2014	Other	Compliance	To verify removal of FG-FINISHSTONE. Requested to void PTI No. 356-08.
10/01/2013	ROP Semi 1 Cert	Compliance	1. CA NO. 1 Carbon changeout not done for FG-PLT1-SCL1256&SCL3&4- Booths 3 & 4 has not been used or has infrequently used since last carbon changeout. Compliance 2. FG-RIMPROCESS CA No. 2 VOC outlet concentration (25.2) exceeded limit of 25 ppm on 1/21/2013. Carbon changeout occurred on 1/25/2013. Compliance 3. FG-RIMPROCESS- Exhaust filters not installed in RIM42. Corrected. Compliance
09/30/2013	MACT (Part 63)	Compliance	MACT Subpart P PPPP 1st Half Semiannual Compliance Report (emission rate w/o add-on controls); During the reporting period, all monitoring and associated recordkeeping requirements in the ROP (FG-MACT) were met. No deviations from these requirements or any other terms or conditions occurred.

Activity Date	Activity Type	Compliance Status	Comments
06/18/2013	Meeting Notes	Compliance	Pre-ROP Application Submittal Meeting.
05/08/2013	MAERS	Compliance	MAERS reviewed and uploaded
03/20/2013	ROP Other	Compliance	2012 MAERS certification -Signed
03/20/2013	ROP Annual Cert	Compliance	Deviations corrected- Acceptable
03/20/2013	ROP SEMI 2 CERT	Compliance	1 deviation for not changing carbon filters CA No.1- Not been operating. Acceptable 1 deviation for exceeding VOC reading from CA No. 3 - Carbon not changed. Readings in the next day show below limit and does not show break through-Acceptable 1 deviation for not changing exhaust filters in FG-PLT1-SCL1256&SCL34-Booths 5 & 6 - Crew unaware of the requirement-Staff leader was instructed to ensure air permit requirement are met. Acceptable, 1 Deviation for not monitoring the condition of the exhaust filters in EU-PLT2-LINE1, FG-PLT1-RIM-IMP, FG-PLT1-SCL1256&SCL34, FG-RIMPROCESS-Employee failed to record- employee was instructed by supervisor and EHS manager to complete the requirements-keeping the records properly currently-Acceptable.
03/20/2013	ROP Other	Compliance	MACT Subpart P PPP 2nd Half Semi-Annual compliance report
09/17/2012	ROP Semi 1 Cert	Compliance	Facility corrected the deviations.
09/17/2012	ROP Other	Compliance	MACT Subpart P PPP 1st Half Semi-Annual Compliance Report
09/06/2012	Scheduled Inspection	Non Compliance	Onsite Inspection

Name: S. Kallumkal

Date: 9/25/14

Supervisor: CTE