

**GM LLC Lansing Delta Township  
Work Practice Plan for the Minimization of Organic HAP Emissions**

Pursuant to Paragraph 63.3094 of NESHAP Subpart IIII, General Motors Lansing Delta Township facility has developed a work practice plan (WPP) as required by the rule. The purpose of the plan is to minimize organic Hazardous Air Pollutant (HAP) emissions from the following activities:

1. The storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which emission limits are established under §63.3090(a) through (d) or §63.3091(a) through (d). These coating operations include ELPO, primer surfacer, topcoat, final repair, glass bonding adhesive operations, sealers and adhesives, and deadener.
2. The cleaning and the purging of equipment associated with all coating operations for which emission limits are established under §63.3090(a) through (d) or §63.3091(a) through (d).

The plan details are identified in the following paragraphs.

**I. Identify HAP containing materials subject to the work plan requirements.**

LDT reviewed the formulation data contained on supplier Safety Data Sheets or requested HAP content from suppliers to identify the HAP containing coatings, thinners, and cleaning materials. LDT then reviewed plant operations to identify where the identified materials are stored, mixed, conveyed, and/or used as equipment cleaning or purging solvents.

The materials, location, and uses are summarized in Appendix - Part (a).

**II. Work Practices addressing HAP emissions from storage, mixing, and conveying of organic HAP-containing coatings, thinners, cleaning materials, and waste materials as identified in Paragraph I.**

**A. Storage Work Practice (63.3094(b) (1))**

The facility has implemented the following storage practices and procedures:

1. Floor personnel are instructed to store materials in closed containers and to close any containers that they observe open.
2. Facility personnel conduct periodic reviews for container status and will close open containers if found. In addition, if containers are found open, personnel in the area will be reinstructed to close containers when not in use.

## **B. Spill Prevention Work Practice (63.3094(b) (2))**

The facility has implemented the following practices to minimize the risk of spills:

1. Materials will be stored indoors in designated areas to the extent practicable to minimize the risk of container puncture during storage or handling.  
Example areas are as follows:
  - a. Low traffic areas
  - b. Paint mix room
  - c. Walled areas
  - d. Flammable cabinets
  - e. Storage tanks
2. Personnel are instructed to store materials, to the extent practical, indoors in areas with containment, curbing, and / or sloped floors.
3. Storage tanks will be equipped with high level alarms to prevent overfilling.
4. Load / unload activities are monitored by a GM representative and are stopped immediately should material be leaked or spilled. The environmental response plan will be initiated to clean up the leak or spill.
5. Material handling and transfer operations are conducted according to specific work plans developed for the function or in accordance with good engineering practices.
6. Employees will be trained pursuant to the Resource Conservation and Recovery Act (RCRA) and Storm Water Pollution Prevention (SWPP), as appropriate.

## **C. Material Conveyance (63.3094(b) (3))**

The facility has implemented the following practices and procedures for material conveyance:

Materials are conveyed in pipes for the following activities:

1. Delivery of paint from the paint recirculation systems to the paint booths
2. Delivery of purge solvent from the paint mix room to the paint booths
3. Recovery of the purge solvent to the reclaimed purge solvent tank
4. Delivery of equipment cleaning solvents to the booths.

Materials that are not conveyed in pipes will be transferred in closed containers.

## **D. Mixing vessels (63.3094(b) (4))**

Appropriate personnel are trained to keep mixing vessels, other than day tanks equipped with continuous agitation systems, which contain organic-HAP-containing coatings and other materials closed except when adding to, removing, or mixing the contents.

**E. Cleaning of storage, mixing and conveying equipment (63.3094(b) (5))**

The facility has implemented the following practices and procedures for the cleaning of storage, mixing, and conveying equipment.

The requirement for the plan to minimize organic HAP emissions during cleaning of storage, mixing, and conveying equipment is satisfied by the implementation of some or all of the activities listed below. LDT will implement one or more of these as appropriate for LDT, taking into consideration the particular operation and activities involved.

Examples of practices which will be considered:

1. Use of low or no HAP cleanup materials.
2. Use of closed loop, recirculating cleaning practices.
3. Minimize to the extent possible, the usage of organic HAP containing cleaning materials.
4. Manage materials in closed containers.

**III. Implement work practices to minimize organic HAP emissions from cleaning and from purging of equipment associated with all coating operations for which emission limits are established under §63.3090(a) through (d) or §63.3091(a) through (d).**

**A. Vehicle body wipe emissions (63.3094 (c)(1)(i))**

LDT will use one or more of the following techniques for vehicle body wipe processes.

1. Use of solvent-moistened wipes.
2. Keeping solvent containers closed when not in use.
3. Keeping wipe disposal/recovery containers closed when not in use.
4. Use of tack-wipes.
5. Use of solvents containing less than 1 percent organic HAP by weight.

The following table identifies the body wiping operations and the techniques in use.

Operation	Location	Technique
Body Wiping	Paint Shop Sealer Deck Paint Shop Preprime Paint Shop Pretopcoat Paint Shop Moist Sand Paint Shop Spot Repair GA Final Paint Repair	1 (Isopropyl alcohol premoistened wipes), 3, 4
Urethane cleanup	GA Windshield Install	3, 5 (Isopropyl Alcohol / water mix)
Body Wiping	GA Water Test Booth Repair	1 (Isopropyl Alcohol premoistened wipes), 3

**Coating line purging emissions (63.3094 (c)(1)(ii))**

LDT will use one or more of the following for coating line purging processes:

1. Air/solvent push-out.
2. Capture and reclaim or recovery of purge materials (excluding applicator nozzles/tips).
3. Block painting to the maximum extent feasible.
4. Use of low-HAP or no-HAP solvents for purge.

The following table identifies the purging operations and the techniques in use.

Operation	Location	Technique
Basecoat	Paint Shop	4 (PPG Aquapurge 3312C)
Clearcoat	Paint Shop	1, 2

**B. Flushing of coating systems (63.3094 (c)(1)(iii))**

LDT will use one or more of the following for the flushing of coating systems:

1. Keeping solvent tanks closed.
2. Recovering and recycling solvents.
3. Keeping recovered/recycled solvent tanks closed.
4. Use of low-HAP or no-HAP solvents

Operation	Location	Technique
Basecoat	Paint Shop	1, 2, 3, 4 (Hot RO water used to clean BC systems)
Clearcoat	Paint Shop	1, 2, 3

**C. Cleaning of spray booth grates (63.3094 (c)(1)(iv))**

LDT will use one or more of the following for the cleaning of spray booth grates:

1. Controlled burn-off.
2. Rinsing with high-pressure water (in place).
3. Rinsing with high-pressure water (off line).
4. Use of spray-on masking or other type of liquid masking.
5. Use of low-HAP or no-HAP content cleaners.

The following table identifies the spray booth and the techniques in use.

Operation	Location	Technique
Basecoat booths	Paint Shop	2 (10 K High Pressure Water) (For information only: grates with a

		permanent barrier coating are in use. May use a barrier coat if needed)
Clearcoat booths	Paint Shop	2 (40 K High Pressure Water Mowers - Spinjets)

**D. Cleaning of spray booth walls (63.3094 (c)(1)(v))**

LDT will use one or more of the following for the cleaning of spray booth walls:

1. Use of masking materials (contact paper, plastic sheet, or other similar type of material).
2. Use of spray-on masking.
3. Use of rags and manual wipes instead of spray application when cleaning walls.
4. Use of low-HAP or no-HAP content cleaners.
5. Controlled access to cleaning solvents.

The following table identifies the spray booth and the techniques in use.

Operation	Location	Technique
Basecoat booths	Paint Shop	2 (Gage S-907 Tacky Coat, Gage S-900B Tacky Clear Booth Coat), 4 (PPG 3312C / RO mix – brushed on) and low-pressure water spray
Clearcoat booths	Paint Shop	2 (Gage S-907 Tacky Coat, Gage S-900B Tacky Clear Booth Coat), 3 and 4 (Chemico 7915 - straight or 50/50 dilution) (scrape and/or brush and rinse with water, {5 K powerwash, if needed})
Spot repair booths	Paint Shop	3 (including tack cloths), 4 (Glass Advantage)
Final Repair booth	General Assembly	4 Glass advantage wipes

**E. Cleaning of spray booth equipment (63.3094 (c)(1)(vi))**

LDT will use one or more of the following for the cleaning of spray booth equipment:

1. Use of covers on equipment (disposable or reusable).
2. Use of parts cleaners (off-line submersion cleaning).
3. Use of spray-on masking or other protective coatings.
4. Use of low-HAP or no-HAP content cleaners.
5. Controlled access to cleaning solvents.

The following table identifies the spray booth equipment and the techniques in use.

Operation	Location	Technique
Basecoat booth robots and applicators	Paint Shop	1, 2, 4 (PPG Aquapurge 3312C / RO mix, Isopropyl Wipes)
Clearcoat booth robots and applicators	Paint Shop	1, 2, 4 (Isopropyl Wipes, Equipment Cleaner CN38183)
Clearcoat conveyor inside booth	Paint Shop	4 (S-553 Cleaning Material, when needed)
Spot repair booth applicators	Paint Shop	4 (PPG Aquapurge 3312C / RO mix, Equipment Cleaner CN38183, Aromatic 100)
Final Repair booth applicators	General Assembly	4 (PPG Aquapurge 3312C / RO mix, or Equipment Cleaner CN38183)

**F. Cleaning of external spray booth areas (63.3094 (c)(1)(vii))**

LDT will use one or more of the following for the cleaning of external spray booth areas:

1. Use of removable floor coverings (paper, foil, plastic, or similar type of material).
2. Use of manual and/or mechanical scrubbers, rags, or wipes instead of spray application.
3. Use of shoe cleaners to eliminate coating track-out from spray booths.
4. Use of booties or shoe wraps.
5. Use of low-HAP or no-HAP content cleaners.
6. Controlled access to cleaning solvents.

The following table identifies the area and the techniques in use.

Area	Location	Technique
Cleanroom	Paint Shop	2, 5 (Chemico 7915 (diluted), Glass Cleaner)

Spot Repair Booth	Paint Shop	1, 5 (Multipurpose Cleaner)
Final Repair Booth	General Assembly	1, 5 (FaST 665)

**G. Housekeeping measures not addressed elsewhere in the plan (63.3094 (c) (1) (viii))**

LDT will use one or more of the following for housekeeping measures not addressed elsewhere in the plan:

1. Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, and similar items) in covered containers when not in use.
2. Storing new and used solvents in closed containers.
3. Transferring of solvents in a manner to minimize the risk of spills.

The following table identifies the area and the techniques in use.

Activity / Cleaning Solvent	Organic HAP Containing	Location	Technique
General Floors – water or Chemico 7915, Paint Shop Foyer – Vinegar for salt in winter	No	Paint Shop	Not applicable
General Floors – water or Chemico 6917E, GA Foyer – Vinegar for salt in winter	No	GA, Body Shop, Stamping	Not applicable

**IV. Plan Communication**

The requirements of this work plan will be communicated to LDT employees and contract employees as appropriate to ensure that the elements of the work plan are properly implemented.

Methods of communication include:

1. Work Instructions/Task Instruction Sheets
2. Hazardous Materials Communications (Chemical Approvals)
3. Team Meetings
4. Employee Instruction/Coaching
5. Work Plans
6. VOC Communication Meetings
7. Other communications, such as emails and newsletters

**V. Inspection Requirements / Corrective Action**

LDT environmental engineers will perform a review once per Title V deviation reporting period or annually at a minimum for those plants without a Title V permit to ensure that the elements of the work plan are properly implemented. The “Work Practice Plan Appendix” will be used to document the review and results.

## **VI. Plan Updates**

This work practice plan will be reviewed once during each Title V deviation reporting period, or annually, and updated as appropriate by the LDT environmental engineer. Every review must be documented regardless of updates to the plan. Reviews will be documented in section XII.

## **VIII. Title V Permit (63.3094 (e))**

This work practice plan is not incorporated into LDT Title V ROP. Revisions to the plan will not constitute revisions to LDT’s Title V ROP. Nonconformances to this work practice plan do not constitute Title V ROP deviations.

## **IX. Plan Retention (63.3094 (f))**

Copies of the current work practice plans, as well as plans developed within the preceding 5 years must be available on-site for inspection and copying by the permitting authority.

## **X. Definitions**

**Closed:** A container is “closed” if its top, lid, hatch, or other opening mechanism is in the closed position. Containers requiring pumps or other devices inserted into the container are considered “closed” if the pump or other device is securely installed.

**Storage:** A container used for the storage of a HAP containing material is one in which no mixing or conveyance takes place. Examples may include totes, drums, and buckets.

**HAP materials:** refers to organic HAP-containing coatings, thinners, cleaning materials, and waste materials, as applicable pursuant to 40 CFR Part 63 Subpart IIII.

## **XI. Document Responsibilities**

**Environmental Engineer or Designee:** Controls work practice plan document and conducts plan reviews.

**Site Personnel:** Utilizes appropriate work practices identified in the work practice plan and supports plan reviews.



## **XII. Plan Review**

Document plan reviews below per Section VI:

<b>Review Date:</b>	<b>Document Reviewer:</b>	<b>Revisions/Review Comments:</b>
5/26/2016	Jeff Hummel	Revised to reflect updates to corporate WPP template
2/10/2017	Jeff Hummel	No Revisions
8/17/2017	Brian Borzenski	No Revisions
3/13/2018	Brian Borzenski	Added references to new WB purge materials
10/16/2018	Brian Borzenski	Plan review; removed references to old WB purge materials
1/7/2019	Brian Borzenski	Plan review for ROP Renewal Application

### **Revision History**

<b>Revision</b>	<b>Date</b>
Updates for ROP Renewal Application, Added Gage S-900B	01-07-2019
Semiannual review performed.	10-16-2018
Semiannual review performed.	3-13-2018
Semiannual review performed.	8-17-2017
Semiannual review performed.	2/10/2017
Revised to reflect updates to corporate WPP template	5-26-2016
Section II.B.7 – Added SWPP, Deleted inactive Cyclosol #53 from Section F table.	2-9-2016
No Update needed.	9-8-2015
Semiannual review: Removed Purge Solvents CN31920 and CN31921, deleted CN38083, updated CC booth wall cleaning information (added brush for 7915 and powerwash), under Section 8 added Foyer cleaning and High volume blow off area information (based on interview with Team Industries, Steve Montgomery), add CC conveyor cleaning material (S-553)	9-16-2014
Semiannual review with Steve Montgomery: no significant updates needed.	2-27-2014
Added Purge solvent CN31922.	7-24-13

MACT WORK PRACTICE PLAN APPENDIX  
 Part (a), Section 1: Identifying Organic HAP Materials  
 Lansing Delta Township

Part (a), Section 1, must be completed and/or reviewed at least once per Title V deviation reporting period (e.g., semi-annually, quarterly) and retained as a record to document compliance with the regulation.

**STEPS TO COMPLETING PART (a), Section 1:**

- 1) Evaluate materials for presence of organic HAPs. The evaluation must include all paints, solvents, adhesives, sealers, and coating operation cleaning materials (e.g., booth cleaners, grate cleaners).  
 (e.g. to perform the evaluation, site can use SDS and GMR2 as resources)
- 2) Record the GM Product ID, the product name, and the application category in the space provided. It is recommended to include the HAP content and any other pertinent information in the Comment column.
- 3) Complete "Review Completed By" and "Review Date" sections at bottom of page.

HAP Material GM Product ID	HAP Material Product Name	Application Category	Comment
SH# 1645846	063CW0104 DSX 1550 Blend	Paint Additive	Total HAP Content: 10%
30052782	262EW0001 PE1385 Paste EOLR Color Control Additive	Final Repair	Total HAP Content: 6%
30000991	31922 Purge Solvent	CC Purge Solvent	Total HAP Content: 9.5%
30093336	38183 Equipment Cleaner	Cleaning Material	Total HAP Content: 3%
356321	Aromatic 100	Cleaning Material	Total HAP Content: 3.2% GA Repair
318396	High Tech Clear Seam Sealer Clear Transparent P10200	Sealer / Adhesive	Total HAP Content: 30.9% Squeeze Tube
234453	High Tech Clear Seam Sealer Clear Transparent P10195	Sealer / Adhesive	Total HAP Content: 18.86% Caulk Tube
348457	High Tech Clear Pump Grade Clear Seam Sealer P10567	Sealer / Adhesive	Total HAP Content: 45% Can
30098817	MIBK	Cleaning Material	Total HAP Content: 100% Used for CC recirc system cleaning.
308035	Quick Seal Black P10556	Sealer / Adhesive	Total HAP Content: 8%
40000294	R10CG062L UREGLOSS CW	Clearcoat	Total HAP Content: 11.5%
40008158	R10CG062T UREGLOSS CW	Clearcoat	Total HAP Content: 4.8% New in 2018
40000305	R10RG325L Glory Red Tint	Clearcoat	Total HAP Content: 11.5%

HAP Material GM Product ID	HAP Material Product Name	Application Category	Comment
40009983	R10RG325T Glory Red Tint	Clearcoat	Total HAP Content: 5.3% New in 2018
339333	S-900B Tacky, Clear Booth Coat	Other--	Total HAP Content: 3% Paint booth coating New in 2018
40000988	Super Degreaser from CRC	Other--	Total HAP Content: 2% Used on headliners in Trim 4; also used for exempt purposes throughout the plant and at mobile truck repair areas
1182343	U53CG073 Low Bake Catalyst	Final Repair	Total HAP Content: 0.5% aka Cymel 325 Resin
102562	Xylene	Cleaning Material	Total HAP Content: 100% Used for CC recirc system cleaning.
1187449	Super-Fast Repair Adhesive PN 04747 from 3M	Sealer / Adhesive	Total HAP Content: 2%
30001339	597WW0137 PW0137 IN RV5800	Paint Additive	Total HAP Content: 0.15% Color tint additive
223283	Denatured Alcohol	Cleaning Material	Total HAP Content: 14.25% Body wiping - in CMM room and weld integrity booth prior to testing. Replaced Brentagg Aromatic 100; LRS Die Room Q10 and N1 usage is exempt
40002849	Dynatex 49412 Black Brush-On Electrical Tape	Final Repair	Total HAP Content: 31.05% Used to repair vehicle wiring
SH# 385041	Tite-R-Bond 2287A	Sealer / Adhesive	Total HAP Content: 3% Has not been used in several years. Still in flam cabinet @ GA M14

**Note 1** The organic HAP content of the materials listed above were obtained from SDS information and GMR2 HAP reports using 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens (and suspected carcinogens), as specified in 29 CFR 1910.1200(d)(4) [as listed as known carcinogen by NTP, IARC or OSHA] and at 1.0 percent by mass or more for other organic HAP compounds.

Review Completed By: **Brian Borzenski**  
Review Date: **1/7/19**

MACT WORK PRACTICE PLAN APPENDIX

Part (a), Section 2: Identifying HAP Material Locations

Lansing Delta Township

Part (b) must be completed at least once per Title V deviation reporting period (e.g., semi-annually, quarterly) and retained as a record to document compliance with the regulation.

**STEPS TO COMPLETING PART (a), Section 2:**

- 1) Identify the "building" and "bay locations" where storing, mixing, and conveying of HAP materials takes place (used in and waste materials generated by), and record in the space provided. Group into categories by common material identifiers and handling methods.
- 2) Identify the "conveyance method" for each HAP material category, and record in the space provided. (Note: The "Conveyance Method" column has a "drop down menu" of choices.)
- 3) Identify the process owner job position for each HAP material, and record in the space provided.

HAP Material Category	Building	Bay	Conveyance Method 40 CFR §63.3094 (b)(3)	Process Owner	Comment
<b>Seal./Adh. - (High Tech Clear Seam Sealer P10200, Quick Seal Black P10556, High Tech Clear Seam Sealer P10195)</b>					
Storing	Paint Sealer Line	C-22, C-23	Not Applicable	Paint Tech Support	
Mixing	Not Applicable	Not Applicable	Not Applicable	Paint Tech Support	
Conveying	Paint Sealer Line	C-22, C-23	Manual	Paint Tech Support	
Storing	GA Water Test Booth	H-5	Not Applicable	GA Group Leader	
Mixing	Not Applicable	Not Applicable	Not Applicable	GA Group Leader	
Conveying	GA Water Test Booth	H-5	Manual	GA Group Leader	
Storing	GA Heavy repair	J-11	Not Applicable	GA Group Leader	
Mixing	Not Applicable	Not Applicable	Not Applicable	GA Group Leader	
Conveying	GA Heavy repair	J-11	Manual	GA Group Leader	
Storing	GA	L-11	Not Applicable	GA Group Leader	
Mixing	Not Applicable	Not Applicable	Not Applicable	GA Group Leader	
Conveying	GA	L-11	Manual	GA Group Leader	
Storing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	

HAP Material Category	Building	Bay	Conveyance Method 40 CFR §63.3094 (b)(3)	Process Owner	Comment
Mixing	Not Applicable	Not Applicable	Not Applicable	Paint Group Leader	
Conveying	GA Paint Hospital	L 8-9	Manual	Paint Group Leader	
Storing	GA	U-16	Not Applicable	GA Group Leader	
Mixing	Not Applicable	Not Applicable	Not Applicable	GA Group Leader	
Conveying	GA	U-16	Manual	GA Group Leader	
<b>Seal./Adh. - Tite R bond 2287A</b>					
Storing	Chem. POU	M-14	Not Applicable	GA Group Leader	
Mixing	Not Applicable	Not Applicable	Not Applicable	GA Group Leader	
Conveying	GA	GA	Manual	GA Group Leader	
<b>Clear Coat Paints, Paint Additives</b>					
Storing	Paint (Mix Room)	F.1-2 - G.1-3	Not Applicable	Paint Tech Support	
Mixing	Paint (Mix Room)	F.1-2 - G.1-3	Not Applicable	Paint Tech Support	
Conveying	Paint	D - F.2, 4 - 7.3 TC BOOTH	Pumps, hard piping	Paint Tech Support	
Storing	Paint Spot Repair	F-25 16'	Not Applicable	Paint Group Leader	
Mixing	Paint Spot Repair	F-25 16'	Not Applicable	Paint Group Leader	
Conveying	Paint Spot Repair	F-25 16'	Manual	Paint Group Leader	
Storing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	
Mixing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	
Conveying	GA Paint Hospital	L 8-9	Manual	Paint Group Leader	
<b>Seal./Adh. - Super-Fast Repair Adhesive PN 04747</b>					
Storing	Paint Spot Repair	16' D19 and Topcoat Review TRN06R	Not Applicable	Paint Group Leader	
Mixing	Not Applicable	Not Applicable	Not Applicable	Paint Group Leader	
Conveying	Paint Spot Repair	16' D19 and Topcoat Review TRN06R	Manual	Paint Group Leader	
Storing	GA	G-4	Not Applicable	GA Group Leader	
Mixing	Not Applicable	Not Applicable	Not Applicable	GA Group Leader	
Conveying	GA - GCA or Repair areas	H-5 to K-12	Manual	GA Group Leader	

HAP Material Category	Building	Bay	Conveyance Method 40 CFR §63.3094 (b)(3)	Process Owner	Comment
<b>CC Purge Solvent- CN31922 Purge Solvent &amp; 38183 Equipment Cleaner</b>					
Storing	Paint (Mix Room)	G-1	Not Applicable	Paint Tech Support	
Mixing	Paint (Mix Room)	G-1	Not Applicable	Paint Tech Support	
Conveying	Paint (Mix Room)	G-1, CC BOOTHS	Manual	Paint Tech Support	
Conveying	Paint	0' D - F.2, 4 - 7.3	Pumps, hard piping	Paint Tech Support	
Storing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	
Mixing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	
Conveying	GA Paint Hospital	L 8-9	Manual	Paint Group Leader	
<b>Repair Paint Additives - U53CG073 Low Bake Catalyst (aka Cymel 325 Resin), Color Control Additive</b>					
Storing	Paint Spot Repair	F-25 16'	Not Applicable	Paint Group Leader	
Mixing	Paint Spot Repair	F-25 16'	Not Applicable	Paint Group Leader	
Conveying	Paint Spot Repair	F-25 16'	Manual	Paint Group Leader	
Storing	Paint (Mix Room)	G-1	Not Applicable	Paint Tech Support	
Storing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	
Mixing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	
Conveying	GA Paint Hospital	L 8-9	Manual	Paint Group Leader	
<b>Waste Materials - Waste Purge Thinner Tank (Reclaim purge solvent)</b>					
Storing	Paint (Mix Room)	G-1	Not Applicable	Paint Tech Support	
Mixing	Paint (Mix Room)	G-1	Not Applicable	Paint Tech Support	
Conveying	Paint (Mix Room)	D-8 - G-1	Pumps, hard piping	Paint Tech Support	
<b>Waste Materials - Waste Paints and Thinners</b>					
Storing	Paint 0' & 16'	G-1, G-2, D-9, E-9, F-25	Not Applicable	Paint Tech Support	
Mixing	Not Applicable	Not Applicable	Not Applicable	Paint Tech Support	
Conveying	Paint 0' & 16'		Manual	Paint Tech Support	
Storing	GA Paint Hospital	L-9	Not Applicable	Paint Group Leader	
Mixing	Not Applicable	Not Applicable	Not Applicable	Paint Group Leader	
Conveying	GA Paint Hospital	L-9	Manual	Paint Group Leader	
<b>Equipment Cleaning Agent - CC recirculation system (MIBK and Xylene), S-900B &amp; 38183 Equipment Cleaner</b>					
Storing	Paint (Mix Room)	F-1, F-2	Not Applicable	Paint Tech Support	
Mixing	Paint (Mix Room)	G-3	Not Applicable	Paint Tech Support	
Conveying	Paint	D - F.2, 4 - 7.3	Pumps, hard piping	Paint Tech Support	

HAP Material Category	Building	Bay	Conveyance Method 40 CFR §63.3094 (b)(3)	Process Owner	Comment
<b>Equipment Cleaning Agent - Aromatic 100</b>					
Storing	GA Paint Hospital	L-9	Not Applicable	Paint Group Leader	
Mixing	GA Paint Hospital	L-9	Not Applicable	Paint Group Leader	
Conveying	GA Paint Hospital	L-9	Manual	Paint Group Leader	
<b>Cleaning Agent - Denatured Alcohol Solvent</b>					
Storing	Body Shop CMM		Not Applicable	Group Leader	
Mixing	Body Shop CMM		Not Applicable	Group Leader	
Conveying	Body Shop CMM		Manual	Group Leader	
<b>Super Degreaser</b>					
Storing	GA	F-19, F-25, J-11, L-11, M-14, U-16	Not Applicable	Group Leader	
Mixing	GA	Not Applicable	Not Applicable	Group Leader	
Conveying	GA	F-19, F-25, J-11, L-11, M-14, U-16	Manual	Group Leader	

<b>Review Completed By:</b> {Enter Name} <b>Review Date:</b> {Enter Date}
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MACT WORK PRACTICE PLAN APPENDIX

Part (b): Storage, Mixing, and Conveying HAP Materials

Lansing Delta Township

Part (b) must be completed at least once per Title V deviation reporting period (e.g., semi-annually, quarterly) and retained as a record to document compliance with the regulation.

ITEM # b.1 40 CFR §63.3094 (b)(1)	<b>TOPIC: Storing HAP materials.</b>											
	<b>ACTIONS:</b>											
	1. Conduct a visual inspection of each HAP material storage area identified in "Part (a), Section 2."											
	2. Confirm that containers are kept closed when not in use.											
	3. Replace cover if any are found open and note occurrence(s) in the "Comments/Validation" column.											
	4. Communicate proper storage procedures, as appropriate.											
	5. Enter inspection date for each HAP category in box under appropriate inspection period.											
	<b>NOTE: If corrective action is required to address a plan nonconformance, provide detail of the action in the "Comments/Validation" column and validate effectiveness. Include dates of all</b>											
	<b>HAP Material Category</b>	<b>ENTER INSPECTION DATE BELOW:</b>	<b>ENTER INSPECTION DATE BELOW:</b>	<b>ENTER INSPECTION DATE BELOW:</b>	<b>ENTER INSPECTION DATE BELOW:</b>	<b>ENTER INSPECTION DATE BELOW:</b>	<b>ENTER INSPECTION DATE BELOW:</b>	<b>ENTER INSPECTION DATE BELOW:</b>	<b>ENTER INSPECTION DATE BELOW:</b>	<b>Comments/ Validation</b>	<b>Building/ Area</b>	<b>Storage Location</b>
	Seal./Adh.--Body Shop											
	ELPO											
	Seal./Adh.--Paint Shop											
	Deadener (GA Foam)											
	Primer Surfacer											
	Base Coat											
Clear Coat												
Paint Additives												
Thinners/Reducers												
Purge Solvents												
Windshield Installation												
Final Repair												
Cleaning Agents												
Reclaimed Purge												
Waste Paints and Thinners												



**TOPIC:** Minimizing HAP material spills.

**ACTIONS:**

1. Conduct a inspection of each HAP material storage area identified in "Part (a), Section 2."
2. Confirm that HAP materials are stored according to WPP.
3. Enter inspection date for each HAP category in box under appropriate inspection period.

**NOTE:** If corrective action is required to address a plan nonconformance, provide detail of the action in the "Comments/Validation" column and validate effectiveness. Include dates of all

ITEM # b.2  
40 CFR  
§63.3094  
(b)(2)

Location	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/ Validation
Seal./Adh.--Body Shop											
ELPO											
Seal./Adh.--Paint Shop											
Deadener (GA Foam)											
Primer Surfacer											
Base Coat											
Clear Coat											
Paint Additives											
Thinners/Reducers											
Purge Solvents											
Windshield Installation											
Final Repair											
Cleaning Agents											
Reclaimed Purge											
Waste Paints and Thinners											

**TOPIC:** HAP material conveyance.

**ACTIONS:**

1. Confirm that HAP materials are conveyed according to WPP.
  
2. List any conveyance system failures in the "Comments / System Failure Details" column adjacent to the applicable HAP material category. If there were no failures in the applicable period, please indicate "none."
  
3. Enter inspection date for each HAP category in box under appropriate inspection period.

ITEM # b.3  
40 CFR  
§63.3094  
(b)(3)

HAP Material Category	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments / System Failure Details (i.e., date, nature of failure, corrective action)	Building	Conveyance Location
Seal./Adh.--Body Shop										
ELPO										
Seal./Adh.--Paint Shop										
Deadener (GA Foam)										
Primer Surfacer										
Base Coat										
Clear Coat										
Paint Additives										
Thinners/Reducers										
Purge Solvents										
Windshield Installation										
Final Repair										
Cleaning Agents										
Reclaimed Purge										
Waste Paints and Thinners										

**TOPIC:** Keeping mixing vessels closed, unless adding or removing material.

**ACTIONS:**

1. Conduct a visual inspection of each HAP material mixing area identified in "Part (a), Section 2."
2. Confirm that vessels are kept closed, unless adding or removing material.
3. Close vessel if any are found open and note occurrence(s) in the "Comments/Validation" column.
4. Re-instruct employees regarding proper mixing vessel procedures, as appropriate.
5. Enter inspection date for each HAP category in box under appropriate inspection period.

**NOTE:** If corrective action is required to address a plan nonconformance, provide detail of the action in the "Comments/Validation" column and validate effectiveness. Include dates of all

ITEM # b.4  
40 CFR  
§63.3094  
(b)(4)

HAP Material Location	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/Validation	General Location
Seal./Adh.--Body Shop												
ELPO												
Seal./Adh.--Paint Shop												
Deadener (GA Foam)												
Primer Surfacer												
Base Coat												
Clear Coat												
Paint Additives												
Thinners/Reducers												
Purge Solvents												
Windshield Installation												
Final Repair												
Cleaning Agents												
Reclaimed Purge												
Waste Paints and Thinners												

**TOPIC:** Minimizing HAP emissions during cleaning of storage, mixing, and conveying equipment.

**ACTIONS:**

1. Conduct a visual inspection of a cleaning activity for a HAP material storage
2. Confirm that HAP emissions were minimized during the cleaning process.
3. If no such cleaning activities took place during the applicable inspection period, please enter "none" in the "Comments/Validation" column.
4. Re-instruct employees regarding proper cleaning procedures, as appropriate.
5. Enter inspection date for each HAP category in box under appropriate inspection period.

**NOTE:** If corrective action is required to address a plan nonconformance, provide detail of the action in the "Comments/Validation" column and validate effectiveness. Include dates of all

ITEM # b.5  
40 CFR  
§63.3094  
(b)(5)

HAP Material Category	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/Validation
Seal./Adh.--Body Shop											
ELPO											
Seal./Adh.--Paint Shop											
Deadener (GA Foam)											
Primer Surfacer											
Base Coat											
Clear Coat											
Paint Additives											
Thinners/Reducers											
Purge Solvents											
Windshield Installation											
Final Repair											
Cleaning Agents											
Reclaimed Purge											
Waste Paints and Thinners											

Inspection Completed By: {Enter Name}  
Inspection Date: {Enter Date}

**MACT WORK PRACTICE PLAN APPENDIX**  
*Part (c): Cleaning and Purging of Coating Equipment*  
**Lansing Delta Township**

The Work Practice Plan must be reviewed against Part (c) at least once per Title V deviation reporting period (e.g., semi-annually, quarterly). The Work Practice Plan review must be retained as a record to document compliance with the regulation.

**STEPS TO COMPLETING PART (c):**

Evaluate site practices for ITEMS # **c.1.i** through **c.1.viii** are properly  
 1) identified in the Work Practice Plan.

At least one method for minimizing HAP emissions must be identified  
 2) for each ITEM in the WPP.

Note: The checklist for "Part b.5" validates how emissions are minimized during the cleaning of mixing and conveying equipment.

<b>ITEM # c.1.i</b> <b>40 CFR §63.3094</b> <b>(c)(1)(i)</b>	<b>Vehicle body wipe</b>
	Use of solvent-moistened wipes
	Keeping solvent containers closed when not in use
	Keeping wipe disposal/recovery containers closed when not in use
	Use of tack-wipes
	Use of solvents containing <1% HAP by weight
<b>ITEM # c.1.ii</b> <b>40 CFR §63.3094</b> <b>(c)(1)(ii)</b>	<b>Coating line purging emissions</b>
	Air/solvent push-out
	Capture/reclaim or recovery of purge mat'l's
	Block painting to maximum feasible amount
	Use of low-HAP or no-HAP solvents
<b>ITEM # c.1.iii</b> <b>40 CFR §63.3094</b> <b>(c)(1)(iii)</b>	<b>Flushing of coating systems (system clean out)</b>
	Keeping solvent tanks closed
	Recovering and recycling solvents
	Keeping recovered/recycled solvent tanks closed
	Use of low-HAP or no-HAP solvents
<b>ITEM # c.1.iv</b> <b>40 CFR §63.3094</b> <b>(c)(1)(iv)</b>	<b>Cleaning of spray booth grates</b>
	Controlled burn off
	Rinsing with high pressure water
	Use of spray on masking or other liquid masking
	Use of low-HAP or no-HAP cleaners
<b>ITEM # c.1.v</b> <b>40 CFR §63.3094</b> <b>(c)(1)(v)</b>	<b>Cleaning of spray booth walls</b>
	Use of masking materials (paper, plastic, etc.)
	Use of spray on masking
	Use of rags and manual wipes instead of spray application
	Use of low-HAP or no-HAP cleaners
	Controlled access to cleaning solvents
<b>ITEM # c.1.vi</b> <b>40 CFR §63.3094</b> <b>(c)(1)(vi)</b>	<b>Cleaning of spray booth equipment (robots, hoses, etc.)</b>
	Use of covers on equipment
	Use of parts cleaners (off-line submersion cleaning)
	Use of spray on masking or other protective coatings
	Use of low-HAP or no-HAP cleaners
	Controlled access to cleaning solvents

<b>ITEM # c.1.vii</b> <b>40 CFR §63.3094</b> <b>(c)(1)(vii)</b>	<b>Cleaning of external spray booth areas</b>
	Use of removable floor coverings
	Use of manual and/or mechanical scrubbers, rags, or wipes instead of spray application
	Use of shoe cleaners to eliminate coating track-out from booths
	Use of booties or shoe wraps
	Use of low-HAP or no-HAP cleaners
<b>ITEM # c.1.viii</b> <b>40 CFR §63.3094</b> <b>(c)(1)(viii)</b>	<b>Housekeeping measures not addressed above</b>
	Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, etc) in covered containers when not in use
	Storing new and used solvents in closed containers
	Transferring of solvents in a manner to minimize the risk of spills

<b>Review Completed By:</b>	<b>{Enter Name}</b>
<b>Review Date:</b>	<b>{Enter Date}</b>