

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

A356930363

FACILITY: Axalta Coating Systems, LLC- Mt Clemens Plant		SRN / ID: A3569
LOCATION: 400 GROESBECK HWY., MOUNT CLEMENS		DISTRICT: Southeast Michigan
CITY: MOUNT CLEMENS		COUNTY: MACOMB
CONTACT: Molly Dwinells , Environmental Contact Person		ACTIVITY DATE: 07/24/2015
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced Level 2 Target Inspection		
RESOLVED COMPLAINTS:		

On July 24, 2015, I conducted a level 2 unannounced target inspection at Axalta Coating Systems, LLC located at 400 N. Groesbeck Highway, Mt. Clemens, MI 48043. The purpose of the inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the administrative rules, and the facility's Clean Air Act of 1990, Title V, Renewable Operating Permit (ROP) No. MI-ROP-A3569-2011d. During the inspection, I was accompanied by Ms. Molly Dwinells, Environmental Coordinator and current facility contact person. At the pre-inspection conference, I showed my ID Badge, stated the purpose of my visit, and gave Ms. Dwinells a copy of the pamphlet, "Environmental Inspections: Rights and Responsibilities".

This facility was previously called DuPont Mt. Clemens Plant, E.I. Du Pont De Nemours and Company. On November 1, 2012, a company transfer of ownership and name change request was approved to Dupont Performance Coatings, LLC. At that time, the facility contact informed me that all of the coatings manufacturing businesses of E. I. DuPont Nemours and Company were being consolidated into one LLC company. On May 23, 2013, the AQD Southeast Michigan District received a request for facility name change to Axalta Coating Systems, LLC. The name change request was processed and got approved effective May 29, 2013. During the follow-up inspection, I was informed that DuPont Performance Coatings, LLC sold its coating manufacturing business to Axalta Coating Systems, LLC.

On May 29, 2015, I was at Axalta facility for an informal preliminary ROP renewal meeting and to conduct an initial field inspection as time permits. The current ROP was initially issued November 14, 2011 and will expire in November 2016. For this facility meeting and inspection, I was accompanied by AQD staff Kerry Kelly. At the pre-inspection conference, we showed our ID Badges, stated the purpose of our visit, and gave Ms. Dwinells a copy of the pamphlet, "Environmental Inspections: Rights and Responsibilities".

I was also at the facility on September 23, 2015 to follow-up on some recordkeeping requirements and discuss the upcoming ROP renewal. Ms.

Dwinnells informed me that the declining emissions were due to usage of materials with less VOC/HAPs during paint and resin manufacturing through reformulations.

Per AQD Administrative Rule R 336.1210(7), submittal of the application for ROP renewal starts no earlier than 18 months before the expiration date of November 12, 2016 and no later than 6 months of the expiration date (May 12, 2016).

The facility manufactures various types of paints and resins (components of coatings) primarily for the automotive industry. The coatings produced can either be water based or solvent based coatings. The facility manufactures epoxy, urethane, and acrylic resins in 5 reactors. In addition, the facility manufactures dispersions and other intermediates as components for making original equipment manufacturing (OEM) automotive paints and primers. The finished products coatings are in the form of e-coat, basecoat, primer, color coat, and clear coat. Each process or sub-process may involve one to several tanks (process/reactor and/or storage) and other ancillary equipment. Some processes may include a particulate and/or VOC emission control equipment such as dust collectors, condenser system, and a thermal oxidizer. Majority of cleaning solvents are reclaimed on-site. Raw materials and intermediates are stored in bulk and/or containers. Finished products gets stored and shipped in various container sizes as specified by customers.

The company's potential Volatile Organic Compound (VOC) emissions facilitywide are greater than 100 tons per year making the facility subject to the Clean Air Act of 1990, Title V, Renewable Operating Permit program and the facility has applied and obtained a Title V permit most recently revised and effective as ROP No. MI-ROP-A3569-2011d. In addition, Axalta obtained Permit to Install (PTI) No. 75-15 on May 14, 2015 to enable EU-ECOATSUP to be moved from FG-RULE290 to FG-DISP-TANKS. Currently, the facility also has a pending permit to install application (PTI Application No. 113-15) related to requests to modify some applicable requirements within the current ROP No. MI-ROP-A3569-2011d.

The facility's current and effective Title V permit, ROP No. MI-ROP-A3569-2011d, includes several emission units and flexible groups. The RO permit includes 10 individual emission units (EUs) with applicable requirements (ARs) namely: EU-RESIN-REACT-4, EU-RESIN-REACT-5, EU-RESIN-REACT-6, EU-RESIN-REACT-7, EU-REACT-8, EU-WBI, EU-IMP, EU-MEL-UNLOAD, EU-S-MEDIA-MILLS(1-4), and EU-WBSB. The ROP also contain 8 flexible groups namely: FG-RESIN-CATHODIC, FG-RESIN-DC8, FGRULE290, FG-DISP-TANKS, FG-THERMOX-MIXTANKS, FG-RULE284TANKS, FGCOLDCLEANERS, and FGRULE287(c).

SOURCE-WIDE CONDITIONS – the facility took individual Hazardous Air Pollutant (HAP) and combined HAPs restrictions to make the facility synthetic minor for HAPs. Per ROP No. MI-ROP-A3569-2011d(B)(SOURCE-WIDE CONDITIONS)(I) (1), the highest FY 2014 individual HAP monthly 12-month rolling total emission for

December 2014 showed 1.11 tons for Glycol Ethers and less than the 9 tons/year permit limit. In August 2015, the monthly 12-month rolling totals for Glycol Ethers were also at 1.11 tons. Per ROP No. MI-ROP-A3569-2011d(B)(SOURCE-WIDE CONDITIONS)(I)(2), the FY 2014 aggregate HAPs monthly 12-month rolling total emissions for December 2014 showed 3.19 tons and less than the 22.5 tons permit limit. In August 2015, the monthly 12-month rolling total aggregate HAPs showed 2.93 tons.

EU-RESIN-REACT-4 – also known as Reactor 4. This process manufactures acrylic resin for automotive topcoats. The process consists of a 2500-gallon reactor tank (RR-4E), a monomer weigh tank (WT-4E), a catalyst weight tank (CT-4EFD), a quench tank (QT-4E), a decanter (DT-4E), a feed tank (FT-4E), a receiver (RT-4E), a charge tank (CT-4E), and a thin tank (TT-4E). The basic process is to mix reactants at elevated temperature for polymerization process to form the resin, cool the resin using a condenser system, filter, and store the product. This process does not have a pollution control equipment. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-4)(I)(1), the highest FY2015 monthly 12-month rolling total VOC emission rate was emitted in October 2014 at 0.843 ton and less than the 4.5 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-4)(III)(1, 2, & 3), I observed the waste solvents were stored in closed containers. I did not observe reactor loading and excessive spillage while conducting a walk through in the area. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-4)(IV), the tanks and mills I observed have covers and I did not observe any visible emissions in the area. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-4)(I)(2) and (VI)(1, 2, & 3), the permittee calculated 0.48 lb. VOC per 1000 lb. resin produced and less than the 0.5 permit limit. Permittee also keeps monthly records of amount of resins produced and highest in October 2014 at 391,813 lb. for FY 2015.

EU-RESIN-REACT-5 – also known as Reactor 5. This process manufactures urethane cross linkers and other intermediates for automotive cathodic primer. The process consists of a 2500-gal reactor tank, two raw materials tanks (WT-5M & MDI-5), a decanter (DT-5), a receiver tank (RT-5), and a thin tank (5M-TT). This process has a condenser system to capture and control VOC emissions. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-5)(I)(1), the highest FY2015 monthly 12-month rolling total VOC emission rate was emitted in October 2014 at 0.693 ton and less than the 2.0 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-5)(III)(1, 2, & 3), I did not observe any splash during reactor loading and the containers for waste solvent storage were closed. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-5)(IV)(1), VOC emissions from the reactor, weigh, decanter, and thin tanks were routed to the condenser system. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-5)(VI)(1, 2, 3, & 4), permittee kept records of resins produced and calculated monthly and 12-month rolling VOC emissions. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-

REACT-5)(I)(2), permittee calculated the VOC emission factor and the table showed a range of 0.091 through 0.151 lb. VOC/1000 lb. of organic resin produced and less than the 0.22 permit limit.

EU-RESIN-REACT-6 – also known as Reactor 6. This process manufactures acrylic resins for automotive topcoats. The process consists of a 2500-gal reactor tank (RR-6A), a monomer weigh tank (WT-6A), catalyst weight tank (6A-CTFD), a quench tank (QT-6A), a decanter (DT-6A), a feed tank (FT-6FEED), a charge tanks (FT-6CHARG), and a thin tank (TT-6A). This process does not have a VOC emissions control system. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-6)(I)(1), the highest FY2015 monthly 12-month rolling total VOC emission rate was emitted in October 2014 at 1.729 tons and less than the 4.5 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-6)(III)(1, 2, & 3), I did not observe any splash during reactor loading and the containers for waste solvent storage were closed. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-6)(IV), all mixing tanks and dispersion mills have covers. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-6)(VI)(1, 2, & 3), permittee kept records of resins produced and calculated monthly and 12-month rolling VOC emissions using a calculated emission factor. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-6)(I)(2), permittee calculated the VOC emission factor and the table showed a 0.48 lb. VOC/1000 lb. of organic resin produced and less than the 0.50 permit limit.

EU-RESIN-REACT-7 – also known as Reactor 7. This process manufactures epoxy grind and backbone resins for automotive cathodic primer. The process consists of a 5000-gal reactor tank (RR-7N), three reactor weigh tanks (WT-71N, 72N, & 73N), a charge tank (CT-74N), a receiver tank (RT7N), another receiver tank shared with Reactor 8 (RT8700), three hold tanks (HT-81 – 83) as well as a stripper shared with Reactor 8 process, and two thin tanks (TT-71N & 73N). This process has a condenser system to capture and control VOC emissions. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-7)(I)(1), the highest FY2015 monthly 12-month rolling total VOC emission rate was emitted in May 2015 at 0.731 ton and less than the 2.0 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-7)(III)(1, 2, 3), I did not observe any splash during reactor loading and the containers for waste solvent storage were closed. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-7)(IV), all stationary and portable reactor tanks had covers. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-7)(VI)(1, 2, 3, & 4), permittee calculated the VOC emission factor, kept records of resins produced, and calculated monthly and 12-month rolling VOC emissions. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-7)(I)(2), permittee calculated the VOC emission factor and the table showed a range of 0.07 through 0.12 lb. VOC/1000 lb. of organic resin produced and less than the 0.50 permit limit.

EU-REACT-8 – also known as Reactor 8. This process manufactures epoxy backbone resins for automotive cathodic primer. The process consists of a 5000-gal reactor tank, two reactor weigh tanks (WT-81 & 82), four charge tanks (CT81 – 84), two receiver tanks (RT-8 & RT8700), and one 12,500-gal thin tank (TT-8). This process has a condenser system to capture and control VOC emissions. Per ROP No. MI-ROP-A3569-2011d(C)(EU-REACT-8)(I)(1), the highest FY2015 monthly 12-month rolling total VOC emission rate was emitted in January 2015 at 3.508 tons and less than the 6.9 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-REACT-8)(III)(1, 2, 3), I did not observe any splash during reactor loading and the containers for waste solvent storage were closed. Per ROP No. MI-ROP-A3569-2011d(C)(EU-REACT-8)(IV), all stationary and portable reactor tanks have covers. Per ROP No. MI-ROP-A3569-2011d(C)(EU-REACT-8)(VI)(1, 2, 3, & 4), permittee calculated the VOC emission factor, kept records of resins produced, and calculated monthly and 12-month rolling VOC emissions. Per ROP No. MI-ROP-A3569-2011d(C)(EU-REACT-8)(I)(2), permittee calculated the VOC emission factor and the table showed a range of 0.05 through 0.08 lb. VOC/1000 lb. of organic resin produced and less than the 0.50 permit limit.

EU-WBI – refers to waterborne intermediate coating manufacturing involving dispersion and other intermediate material production processes. The color or pigmented materials go through a mechanical process to disperse the particles for waterborne paint manufacturing, using LMZ mills (LMZ 81-86), Schold Mill (SM 55), and portable tanks. There are no stacks associated with this process. The intermediates process blends resins, solvent (including water), & aluminum paste, or mica pearls, or Laponite into one of five process tanks (W1250, 1253, 1255, 2452, & 2456). A dust collector (DC-06) is used to control emissions during powder loading. This emission unit is also part of FG-DISP-TANKS. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBI)(I)(1), the highest FY2015 monthly 12-month rolling total VOC emission rates were emitted in April and May 2015 at 1.477 tons each and less than the 3.8 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBI)(II), the highest monthly 12-month rolling total waterborne intermediate coating production occurred in October 2014 at 3,271,492 gallons and less than the 4,500,000 gallons permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBI)(VI)(1, 2, & 3), permittee kept monthly and 12-month rolling total VOC and gallons of product produced.

EU-IMP – refers to Improved Manufacturing Process, an automated production process of pigmented solvent borne products. It consists of seven 500-gal dosing tanks (CST- 1 through 7), three 250-gal dosing tanks (CST- 11 through 13), four solvent viscosity adjustment tanks (VAT-1 & 2, vented to the room; and VAT-3 & 4, vented outside); two 3000-gal blend tanks (MB10 & MB14); two storage tanks (MB8 & MB11); two fill heads; and a mix head. The process has no VOC emission control but it is equipped with a manifold venting system that reduces VOC emission from Blend Tanks (MB10 & MB14), Wash Tanks (WT-2 & 3), and Product

Damper Tanks (DT-1 & FD-1). Per ROP No. MI-ROP-A3569-2011d(C)(EU-IMP)(I)(1), the highest FY2015 monthly 12-month rolling total VOC emission rate was emitted in October 2014 at 5.007 tons and less than the 30.0 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-IMP)(II), the highest monthly 12-month rolling coating production total occurred in October 2014 at 1,251,763 gallons and less than the 2,400,000 gallons permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-IMP)(III)(1), I was unable to observe the manifold venting system. Per ROP No. MI-ROP-A3569-2011d(C)(EU-IMP)(III)(1 & 2), I did not observe any spills or splashing while at the area. Per ROP No. MI-ROP-A3569-2011d(C)(EU-IMP)(IV), the tanks were covered. Per ROP No. MI-ROP-A3569-2011b(C)(EU-IMP)(VI)(1, 2, & 3), permittee kept monthly and 12-month rolling total VOC and gallons of product produced. I observed a 4' x 2' parts washer in this area. The lid was closed and safety operating instructions were in place.

EU-MEL-UNLOAD – refers to Melamine resins unloading operation. The facility receives these resins from off-site through 5,000 gallon vehicles that unload at stations 4 & 5. Per ROP No. MI-ROP-A3569-2011d(C)(EU-MEL-UNLOAD)(I)(1), the submitted records showed a consistent 0.0880 lb./hr monthly average of Formaldehyde emission rate and below the 0.28 lb./hr. permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-MEL-UNLOAD)(I)(2), records showed that the monthly 12-month rolling total Formaldehyde emission rate was highest in May 2015 at 0.0162 ton and below the 0.24 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-MEL-UNLOAD)(III), the highest resin monthly 12-month rolling total loading hours occurred in May 2015 at 368 hours and below the permit limit of 1752 hours/12 months.

EU-S-MEDIA-MILLS – refers to small media mills (tanks SM-9, SG-13, SG-14, & SG-28) for dispersions manufacturing. The process only handle mixing and mechanical grinding and does not involve chemical reactions and a dust collector controls particulate emissions from powder loading. Per ROP No. MI-ROP-A3569-2011d(C)(EU-S-MEDIA-MILLS)(I)(1), the highest FY2015 monthly 12-month rolling total VOC emission rate was emitted in May 2015 at 8.995 tons and less than the 25.0 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-S-MEDIA-MILLS)(II)(1), the highest monthly material produced occurred in March 2015 at 69,227 gallons and less than the 147,000 gallons permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-S-MEDIA-MILLS)(III)(1 & 2), I did not observe cleaning of equipment and the wash solvent storage containers were closed. Per ROP No. MI-ROP-A3569-2011d(C)(EU-S-MEDIA-MILLS)(IV), the mills were covered. Each mill had a temperature monitoring device. Submitted records for June 2015 showed temperatures below the 150°F permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-S-MEDIA-MILLS)(VI), permittee kept monthly and 12-month rolling total VOC emission rates, gallons of materials produced, and the operating temperature of each mill. I also observed a 4' x 2' parts washer in this area with the lid closed and safety operating instructions in place.

EU-WBSB – refers to small batch paint manufacturing process that was recently incorporated in the ROP from PTI No. 123-14 per ROP No. MI-ROP-A3569-2011d. This emission unit was previously under FG-RULE290. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBSB)(I)(1), the highest FY2015 monthly 12-month rolling total VOC emission rate was emitted in May 2015 at 0.053 ton and less than the 1.2 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBSB)(II)(1), the highest monthly material produced occurred in March 2015 at 17,648 gallons and less than the 21,250 gallons permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBSB)(III)(1 & 2), I did not observe cleaning of equipment and the wash solvent storage containers were closed. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBSB)(IV), the production vessels were covered. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBSB)(VI), permittee kept monthly and 12-month rolling total VOC emission rates and gallons of materials produced. I observed a 3' x 2' parts washer in this area with the lid closed and safety operating instructions in place. Per Ms. Dwinnells, this emission unit is not covered by 40 CFR Part 63 Subpart CCCCCC because no pigment is being loaded and the material being handled is liquid and not solid.

FG-RESIN-CATHODIC – refers to the 2 alternating condenser system VOC emissions control from the resin reactors. It includes the emission units EU-RESIN-REACT-1, EU-RESIN-REACT-5, EU-RESIN-REACT-7, and EU-RESIN-REACT-8. One condenser is in defrost mode while the other one operates. The condensers are cooled by a refrigeration unit and the condensate is collected in a 500 gallon portable tank with an extra tank on standby. Per ROP No. MI-ROP-A3569-2011d(D)(FG-RESIN-CATHODIC)(I), the FY2015 highest Toluene Diisocyanate average emission rate calculated monthly was at 0.00065 lb./hr. and less than the 0.002 lb./hr. permit limit. Per ROP No. MI-ROP-A3569-2011d(D)(FG-RESIN-CATHODIC)((III)(1) & (IV)(1)), the condenser system appeared to be operating properly. There's a malfunction abatement plan (MAP) in place. The submitted records for June 2015 showed average operating temperature of heat exchanger HX-28 at 46.84°F and heat exchanger HX-29 at 45.52°F. Per ROP No. MI-ROP-A3569-2011d(D)(FG-RESIN-CATHODIC)((IV)(2) & (VI)(1)), permittee maintains temperature and records the exhaust temperature electronically at 15 minutes interval and 90% of operating time. Per ROP No. MI-ROP-A3569-2011d(D)(FG-RESIN-CATHODIC)(VI)(2-4)), permittee keeps records of any bypass, exceedances and calculates emissions per Appendix 7. Per facility contact, permittee is not subject to 40 CFR Part 63 Subpart CCCCCC due to material usage.

FG-RESIN-DC8 – this flexible group refers to a common dust collector particulate control (DC8) for EU-RESIN-REACT-1, EU-RESIN-REACT-7, and EU-RESIN-REACT-8 during powder loading. Per ROP No. MI-ROP-A3569-2011d(D)(FG-RESIN-DC8)(VI)(1-2), a continuous pressure drop monitor was installed and

operating properly. Submitted records showed that the pressure drop across the dust collector was at 1.1 inches water gauge in June 1, 2015. The dust collector is routinely checked on a monthly basis and any activity performed is recorded.

FGRULE290 – refers to PTI exempt equipment/processes pursuant to AQD Rules 278 and 290. The emission units included are: EU-RESIN-REACT-1, EU-BT(1-3), EU-FSO, EU-LMZ(1-4), EU-TSM, EU-CGM1000M(22), EU-CGM1000S(8), EU-CGM2500(5), EU-CGM250(4), EU-CGM3500(5), EU-CGM1500(1), EU-CGM5000(4), EU-CGM500(9), EU-SOLV-RECOVERY, EU-QA-ECOAT, EU-SBI(1-11), EU-ECOATSUP, and EU-MBFPT(1-22). Per ROP No. MI-ROP-A3569-2011d(D) (FGRULE290)(I)(3), the emission units/flexible group that emit particulate contaminants, have appropriately designed fabric filter system. I did not observe any visible emissions while at the facility. Per ROP No. MI-ROP-A3569-2011d(D) (FGRULE290)(VI)(1), permittee kept records of each air contaminant, emission unit control/uncontrolled, carcinogenic/non-carcinogenic, ITSL/IRSL, calculations of emissions and the summaries. All the ITSL and IRSL calculated emission values are less than the Rule 290 limits. Permit to Install No. 75-15 was issued last May 14, 2015 to remove EU-COATSUP from FG-RULE290 and include the same emission unit in FG-DISP-TANKS.

FG-DISP-TANKS – this flexible group refers to EU-S-MEDIA-MILLS(1-4), EU-LMZ(1-4), EU-TSM, EU-SBI(1-11), EU-WBI, EU-DISP-TANK(1-11), and EU-COATSUP. These emission units are associated with dispersion premix tanks. Emissions from EU-S-MEDIA-MILLS(1-4), EU-TSM, EU-SBI(1-11), EU-DISP-TANK(1-11), EU-WBI, and EU-COATSUP, are controlled by dust collector DC-06 during powder loading. Emissions from the two dispersion pre-mixers of the EU-LMZ(1-4) are controlled by two dust collectors, LMZREDHP & LMZBLKHP. Per ROP No. MI-ROP-A3569-2011d(C)(FG-DISP-TANKS)(I)(2), the highest FY2015 monthly 12-month rolling total VOC emission rate for EU-DISP-TANK was emitted in May 2015 at 11.621 tons and less than the 22.5 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(FG-DISP-TANKS)(IV), the associated dust collectors appeared to be operating properly. During inspection, I observed a DC-06 pressure drop reading of 3.0 inches of water. A sample page of the continuous pressure drop recordkeeping was submitted for DC-06 and DC-08. A manual pressure drop reading is also being recorded at start and end of each pigment load and submitted sample record showed 8 and 10 inches of water pressure readings respectively in May 2015. Per ROP No. MI-ROP-A3569-2011d(C)(FG-DISP-TANKS)(VI), permittee kept records of monthly and 12-month rolling total VOC emission rates, monthly routine checks of dust collectors, and the continuous pressure drop readings for the dust collectors. Per PTI No. 75-15, special condition FG-DISP-TANKS(I)(3), the EU-COATSUP monthly 12-month rolling total VOC emission rate was highest in May 2015 at 0.051 ton and less than the 6.9 tpy permit limit.



FG-THERMOX-MIX-TANKS – refers to emission units whose emissions are ducted into a thermal oxidizer for VOC control. The 29 emission units/tanks (solvent borne clearcoat/basecoat tanks: C5001, 5002, 5003, 5004, 5005, 5006, & 5007; water borne tanks: W2402, 2406, 2424, 2434, 2436, 2438, 2440, 2442, 2446, 3612, 3620, 3622, 3628, 3630, 1204, 1214, 1216, 1218, 1226, 1232, 1244 & 4808) are paint final product mix tanks. Per ROP No. MI-ROP-A3569-2011d(D)(FG-THERMOX-MIX-TANKS)(I), the FY2015 highest reported monthly 12-month rolling total VOC emission rate after control occurred in for May 2015 at 1.283 tons and less than the 2.0 tons permit limit. Per ROP No. MI-ROP-A3569-2011d(D)(FG-THERMOX-MIX-TANKS)(III)(1), I observed 1531°F oxidizer temperature during inspection which is above the minimum temperature limit of 1500°F. Per ROP No. MI-ROP-A3569-2011d(D)(FG-THERMOX-MIX-TANKS)(III)(2), I did not observe any solvent splash during loading. Per ROP No. MI-ROP-A3569-2011d(D)(FG-THERMOX-MIX-TANKS)(IV), a continuous temperature monitoring device is installed and appeared to be operating properly. The temperature is electronically recorded and the monitoring device has an interlock system to shut the system down if the temperature falls below 1550°F for more than 15 minutes. Per ROP No. MI-ROP-A3569-2011d(D)(FG-THERMOX-MIX-TANKS)(VI)(1-5), the temperature device is calibrated every 6 months, coating use and VOC emissions records and calculations are conducted and kept monthly including 12-month rolling totals, and monthly summaries of temperature data.

FG-RULE284TANKS – refers to any existing or new (placed into operation after 7/1/79) or modified storage tanks that are exempt from the requirements of R336.1201 (NSR permitting) pursuant to R336.1284, and subject to 40 CFR 60.110 (a), (b), and 60.116(b). The emission units are EU-STORAGE-SOLV(1-21), EU-STORAGE-MONOM(1-6), EU-STORAGE-RESIN(1-65), and EU-STORAGE-MISC (1-8). Per ROP No. MI-ROP-A3569-2011d(D)(FG-RULE284TANKS)(IV & VI), permittee kept records of the above tanks including type, capacity, installation date, description of stored material, vapor pressure, specific gravity, applicable requirements, and temperature.

FGCOLDCLEANERS – refers to any cold cleaner (parts washer) that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979 while new cold cleaners were placed into operation on or after July 1, 1979. Aside from EU-COLD-CLEANER(1-4), permittee has 9 additional parts washers for a total of 13 units. Per ROP No. MI-ROP-A3569-2011d(D)(FGCOLDCLEANERS)(IV)(1-5), the air/vapor interface is less than 10 square feet each, the emissions are released in the general in-plant environment, no heated parts, and the lids are closed. Several of the parts washers that were inspected were discussed in the various emission units/flexible groups above. Per ROP No. MI-ROP-A3569-2011d(D)(FGCOLDCLEANERS)(VI)(1-4), the unit has serial number, date of installation, and posted written operating instructions.

FG-RULE287(c) – refers to spray booth coating operation exempt from Rule 201 pursuant to Rule 278 and 287(c). The facility reported a total of 17 units mostly in EU-LAB-BOOTHs. AQD staff Kerry Kelly and I inspected some of these booths and found filters in place. Submitted records for monthly coating usage showed less than 200 gallons coating usage per month for each emission unit and less in compliance with ROP No. MI-ROP-A3569-2011d(D)(FG-RULE287(c))(II)(1).

At the time of the inspection, I did not observe any noncompliance issues.

NAME K/A G

DATE 9/30/2015

SUPERVISOR CJE