COMPLIANCE TEST REPORT

Precision Coatings, Inc.
RECO 1-THERMAL OXIDIZER
RECO 2-THERMAL OXIDIZER
J. ZINC-THERMAL OXIDIZER

Prepared for:

PCI

Precision Coatings, Inc.
Walled Lake, MI

Prepared by:

Environmental Quality Management, Inc.
1280 Arrowhead Court
Suite 2
Crown Point, IN 46307
(219) 661-9900
www.eqm.com

PN: 050692.0002

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DEQ

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

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RENEWABLE OPERATING PERMIT REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name PRECISION COATINGS, INC County OAKLAND

Source Address 8120 GOLDIE ST City WALLED LAKE

AQD Source ID (SRN) A5496 ROP No. MI-ROP-A5496-2014 ROP Section No.

Please check the appropriate box(es):

☐ **Annual Compliance Certification (Pursuant to Rule 213(4)(c))**

Reporting period (provide inclusive dates): From _____ To _____

☐ 1. During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.

☐ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, **EXCEPT** for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

☐ **Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))**

Reporting period (provide inclusive dates): From _____ To _____

☐ 1. During the entire reporting period, **ALL** monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

☐ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, **EXCEPT** for the deviations identified on the enclosed deviation report(s).

☒ **Other Report Certification**

Reporting period (provide inclusive dates): From 02/24/15 To 02/25/15

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

Destruction Efficiency Test / Compliance Test

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

ROBIN D. VAN TILBURG	V.P. OF OPERATIONS	248.363.8361
Name of Responsible Official (print or type)	Title	Phone Number
Robin D. Van Tilburg		4/27/15
Signature of Responsible Official		Date

* Photocopy this form as needed.

EQP 5736 (Rev 11-04)

PREFACE

I, Karl Mast, do hereby certify that the source emissions testing conducted at Precision Coatings, Inc.'s, plant was performed in accordance with the procedures set forth by the United States Environmental Protection Agency, and that the data and results submitted within this report are an exact representation of the testing.

Karl Mast
Test Supervisor

I, Karl Mast, do hereby attest that I have reviewed the test results and attest that this report accurately and authentically presents the source emissions testing conducted at Precision Coatings Inc.'s plant in Walled Lake, Michigan.

Karl Mast
Test Supervisor

SUMMARY

The compliance emission testing was performed on three Regenerative Thermal Oxidizers (RTO's). The RTO;'s control VOC emissions at the Precision Coatings, Inc.'s (PCI's) facility in Walled Lake, Michigan. The testing was performed as required for compliance as a requirement of PCI's renewable operating permit that is dated September 2, 2014. The testing was performed on February 24-25, 2015 utilizing USEPA Methods 1, 2, 3 4, and 25A at the inlet and outlet sampling locations. The results of the testing are summarized in the following table.

VOC Destruction Efficiency Testing Results (%)			
Run No.	**Reco 1**	**Reco 2**	**J. Zink**
1	92.5	96.2	96.2
2	92.0	95.9	95.9
3	92.4	96.2	96.4
Average	92.3	96.1	96.2
Permit Limit	90.00	92.50	90.25

1. INTRODUCTION

This report presents the results of the source emissions testing conducted by Environmental Quality Management, Inc. (EQ) for Precision Coatings, Inc. (PCI) in Walled Lake, MI. In fulfillment of Michigan Department of Environmental Quality, Air Quality Division, permit no. MI-ROP-A59496-2014, the testing was performed utilizing USEPA Methods 1-4 and 25A, at the Inlet and Outlet Exhaust Stack sampling locations of EU-LINE1RECO2 (Reco 2) that is controlled by a regenerative thermal oxidizer (RTO), aka new RECO, EU-LINE4RECO1 (Reco 1) that is controlled by a regenerative thermal oxidizer (RTO), aka old RECO, and EU-LINE6ANDJZINK (JZink) that is controlled by a regenerative thermal oxidizer (RTO) to test for volatile organic compound (VOC) destruction efficiency (DE).

To ensure that compliance with the emission limits is maintained, PCI contracted Environmental Quality Management, Inc. (EQ) to perform the source emissions testing. The primary purpose of this testing program was to conduct emissions testing of the three regenerative thermal oxidizers (RTO's) which control VOC emissions at the company's plant located in Walled Lake Michigan. The compliance testing was performed to evaluate the performance of the RTO's and show compliance of the VOC DE.

EQ's responsibility was to conduct emissions testing for VOC DE for the emissions testing program and perform data reduction for conformance evaluation. PCI's responsibility was to maintain process operating parameters, and to record and provide process operating and relevant parametric monitoring data per compliance test requirements.

The following report provides information pertaining to PCI's process operations, and Compliance testing. The Compliance testing conducted on the RTOs were performed on February 24-25, 2015.

The following requirements were specific for the testing program:

1. Testing equipment calibrations performed and calibration data provided.
2. Three (3) consecutive, one (1) hour, minimum, VOC emissions test runs performed simultaneously at the inlet and outlet of each TGO sampling locations pursuant to USEPA 40 CFR 60, Appendix A..
3. Multi-point integrated gas sampling performed during the VOC emissions testing.
4. Process manufacturing capacities and emission control devices maintained at required operating conditions, and production rates and process operating information recorded during the VOC emissions sampling periods.
5. All testing and analysis performed in accordance with current USEPA test methodologies and analytical procedures for gas flow, moisture content, and VOC emissions determinations.

The emissions testing program was supervised by Environmental Quality Management, Inc. (EQ), whose headquarters is located in Cincinnati, OH. EQ performed the VOC emissions testing for each TGO, data review and prepared the final report.

The emissions testing was performed in accordance with EPA Reference Methods 1, 2, 3, 4, and 25A (TGO), 40 CFR 60, Appendix A.

The testing program was approved by and/or coordinated with Jason Smith, PCI. The emission testing was performed by Karl Mast, Manager Air Emissions, EQ, Jeff Cavanaugh, Test Technician, EQ, and Zack Hill, Test Technician., EQ. The emission testing was observed by Tom Gasloli, Technical Programs Unit, Field Operations Section, Air Quality Division, MDEQ.

2. TEST RESULTS SUMMARY

The source emissions testing and evaluations were conducted utilizing U.S. EPA Methods 1, 2, 4 and 25A. Summaries of the VOC test results are provided in Table 1. In addition, summaries of the flow and moisture testing are found in Tables 2 through 10 on the following pages.

Sample calculations and examples of the equations used to generate the test results can be found in Appendix E.

Table 1. Test Results Summary-Test Results-RTOs

VOC Destruction Efficiency Testing Results (%)			
Run No.	**Reco 1**	**Reco 2**	**J. Zink**
1	92.5	96.2	96.2
2	92.0	95.9	95.9
3	92.4	96.2	96.4
Average	92.3	96.1	96.2
Permit Limit	90.00	92.50	90.25

Based on the information provided above, all three regenerative thermal oxidizers met the acceptance criteria during the course of the testing. A complete list of performance parameters for each test run that was performed at the stack sampling locations can be found in Appendix A