B3037 manilla

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B303763188

FACILITY: FITZGERALD FINISHING LLC		**SRN / ID:** B3037
LOCATION: 17450 FILER, DETROIT		**DISTRICT:** Detroit
CITY: DETROIT		**COUNTY:** WAYNE
CONTACT: Amanda Davison , Environmental Health and Safety Coordinator		**ACTIVITY DATE:** 06/13/2022
STAFF: Jorge Acevedo	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

COMPANY NAME : **Fitzgerald Finishing**

FACILITY ADDRESS : **17450 Filer, Detroit, MI**

STATE REGISTRAT. NUMBER : **B3037**

SIC CODE : **3479**

LEVEL OF INSPECTION : **PCE**

DATE OF INSPECTION : **6/13/22**

TIME OF INSPECTION : **10:30 AM**

DATE OF REPORT : **9/12/22**

REASON FOR INSPECTION : **Targeted Inspection.**

INSPECTED BY : **Jorge Acevedo**

PERSONNEL PRESENT :**Amanda Davison, Larry Gutowsky**

FACILITY PHONE NUMBER : **313-368-3630 x 228**

FACILITY FAX NUMBER : **313-368-6210**

FACILITY BACKGROUND:

Fitzgerald Finishing is a coating facility. Fitzgerald focuses on coating small metal parts. Fitzgerald Finishing has been operating since 1957 and is located South of Davison, East of Mound, North of McNichols, and West of Van Dyke, in Detroit.

INSPECTION NARRATIVE:

On June 13, 2022, I conducted a targeted inspection of Fitzgerald Finishing. Prior to entering the facility, I drove around the facility at approximately 10:20 AM. Skies were partly cloudy and winds were out of the East. I did not detect any offsite odors while performing odor surveillance. I met with Amanda Davison, Environmental Health and Safety Coordinator and

Larry Gutowsky, General Manager, at 10:30AM. I explained that the purpose of my visit was to conduct an inspection to determine Fitzgerald Finishing's compliance with Part 55, Air Pollution Control, of ACT 451(Natural Resources and Environmental Protection Act), the federal Clean Air Act, and Permit 403-99D. Fitzgerald applied and received a general permit for a burn off oven since the last inspection. The General Permit was issued on August 31, 2021.

We went into Fitzgerald Finishing's conference room and discussed Fitzgerald Finishing's operations and equipment. Ms. Davison explained some of the changes that occurred at Fitzgerald since the last inspection in 2019. She explained that the new oxidizer had been performing fine with no issues. The coating lines were operating in the same manner as the previous inspection. The facility is operating two shifts five days a week, according to Mr. Gutowsky. The facility installed a burn-off oven in 2022. They use the burn off oven to process the metal baskets that are used in the dip spin process. They use the burn off oven approximately once a day.

I asked about the old oxidizer and they mentioned it was still on site. I explained that during my inspection preparation, the previously issued permit (403-99C) allowed for the use of the older oxidizer (RTO-1) in the case the newer oxidizer (RTO-2) went down. This ability was removed with the issuance of 403-99D. I alerted this fact to Amanda and Larry and said that if they want that flexibility, they should come in for a revision to their existing permit.

In 2017, a manufacturer defect caused major damage to the oxidizer. The company was able to use their old oxidizer during the time the main oxidizer was out of commission for repairs.

I asked Amanda and Larry if they had installed any emergency generators. They responded that they have considered it but have not made any plans to move forward.

After our discussion of Fitzgerald Finishing's equipment and operations, we proceeded to conduct the inspection.

We began the inspection at the south end of the facility. I observed the oxidizer and it was operating at the time of the inspection. I did not observe any opacity at the time of the inspection. I observed the operating temperature and it read 1567°F. After observing the oxidizer, we went back inside the facility. I observed Lines 9 and 10. Line 9 is on the east side of the facility and Line 10 is on the opposite side. I inquired about Line 10 as it looked different. Larry and Amanda indicated that the front half of the line was remodeled but the oven remained the same. There was no increase in capacity with the changes.

I observed some shotblast equipment which was not running at the time of the inspection. . Parts are shot blasted if needed to remove paint. There was no excessive shotblast media outside collection barrel. The machine is vented to a dust collector which is not vented externally.

Next, we went to the paint storage area. The area was kept clean. I indicated to Amanda that there were some waste containers not covered and said that the permit to install requires waste containers to be covered when not in use. I did not observe any lids open on any of the paint storage containers. I observed Fitzgerald's current inventory of coatings and solvents. I did not detect strong coating or solvent odors while in the paint room. I did not observe excessive spills in the paint storage room.

Next, I observed Line 7 and Line 8 next. They were both operating at the time of inspection. Line 8 has a dust collector which is ducted inside. I asked Larry about this and he explained that this was installed some years back to see if they could remove some particulates from the operation. Next, we observed Line 1, Line 2, and Line 3. The coating process usually takes around forty-five minutes. Parts are loaded into the dip spin line, coated, and then the parts are baked in the oven. The oven temperature ranges from 250-520 F° depending on the engineering standard of the part.

Next, I observed the zinc phosphate cleaning line(Jessup line) which there are four lines. The cleaning lines use a phosphate cleaner for 90% of the parts before they are coated. The phosphate helps the coating adhere better to the part. The washing process takes around 45 minutes to complete. 50% of the product gets an acid zinc phosphate coating.

We then went across the street to see the burnoff oven. It was not operating at the time of the inspection. I did take a photo of the gauges that are on the oven. It was installed earlier in the year. In the same building as the burnoff oven, I observed a stand alone power washer that uses water. The equipment was not in use. I also observed two table top shot blasting machines that were vented inside. They were not operating at the time of the inspection. There was an old inactive oven in the building as well.

We went back to the conference room to discuss the inspection. I requested records from 2021 to 2022 year to date. Ms. Davison provided records via email on June 23, 2022, June 27, 2022, August 8, 2022, and August 26, 2022. I left the facility at 12:05 PM.

COMPLAINT/COMPLIANCE HISTORY:

There have not been any citizen complaints registered against Fitzgerald Finishing.

OUTSTANDING CONSENT ORDERS:

None

OUTSTANDING LOVs

None

OPERATING SCHEDULE/PRODUCTION RATE:

Fitzgerald Finishing operates two shifts a day, 5 days a week.

PROCESS DESCRIPTION:

Fitzgerald Finishing coats small metal parts, such as fasteners. Coating takes place in any of ten "Dip/Spin" lines. Each line consists of a Dip/Spin cabinet and a curing oven. Inside the cabinet at the bottom is a pot of coating. Also inside is a basket, located above the pot. The small metal parts to be coated are conveyed into the cabinet and fall into the basket. The pot, which is half full with coating, is raised until the basket is submerged in the coating. The pot is then lowered so that the basket is out of the coating, but not out of the pot. The basket is then spun to shake off the excess coating. The dip/spin cycle lasts about a minute. The parts are then conveyed into the curing oven. The curing temperature is from about 300 ° F to about 600 ° F depending on the coating. Curing can take up to 45 minutes. The pots and baskets are not cleaned on site. Fitzgerald Finishing has a supply of clean pots and baskets on hand when different coatings are used in the same line.

EQUIPMENT AND PROCESS CONTROLS

Lines 9 and 10 are located in the southern end of the building. This portion of the building was added on later. Line 4 is located at the northern end, along with the two cleaning lines. The cleaning lines consist of alkaline baths, acid baths and rinse tanks. The cleaning operation is exempt from a permit to install via Rule 290. In the middle portion of the building are Lines 1, 2, 3, 7, and 8.

Emissions from all the lines are routed to a regenerative thermal oxidizer (RTO). Each line also has a bypass stack to vent directly to the ambient air if the RTO shuts down. The RTO is located immediately outside the east side of the building. Its combustion temperature is monitored continuously and recorded and saved to a database.

APPLICABLE RULES/PERMIT CONDITIONS:

Emissions from the coating lines are regulated by DEQ-AQD permit 403-99D. Because of this permit, Fitzgerald Finishing is a synthetic minor source of HAPs. This permit requires daily records of coating usage and VOC emissions. It also requires monthly records of HAP emissions. The requirements of 403-99D are provided in this report in addition to determination of compliance. Fitzgerald Finishing uses the services of Derenzo and Associates (contacts Rob Harvey & Andy Rusnak (517- 324-1880) to maintain the records. The records are maintained on an EXCEL spreadsheet format and are also printed every month and stored in binders.

The Compliance Discussion is as Follows:

The following conditions apply to: FG-DIPSPINS

DESCRIPTION: Eight (8) miscellaneous metal parts coating lines controlled by either RTO1 or RTO2.

Emission Unit ID: EU-DIPSPIN1, EU-DIPSPIN2, EU-DIPSPIN3, EU-DIPSPIN4, EU-DIPSPIN7, EU-DIPSPIN8, EU-DIPSPIN9, EU-DIPSPIN10

POLLUTION CONTROL EQUIPMENT: RTO1, RTO2

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Compliance Determination
1. VOCs	54.0 tpy	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance- Records were received from January 2021 to May 2022. VOC emissions were below 54.0 TPY on a 12 month rolling period.
2. Heavy aromatic solvent naphtha (CAS No. 64742-94-5)	157.6 lb/day	Calendar day	FG-DIPSPINS	Compliance- Records were received from January 2021 to May 2022. Heavy Aromatic Solvent Naphtha emissions were below 157.6 lb/day.

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Compliance Determination
3. Cumene (CAS No. 98-82-8)	969.5 lb/yr	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance- Records were received from January 2021 to July 2022. Cumene emissions were below 969.5 lb/yr on a 12 month rolling period.
4. Dibasic ester family (CAS Nos. 627-93-0, 106-65-0, 1119-40-0)	19,714 lb/yr	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance- Records were received from January 2021 to May 2022. Dibasic ester emissions were below 19714 lb/yr on a 12 month rolling period.
5. Ethyl methylbenzene (CAS No. 611-14-3)	969.9 lb/yr	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance- Records were received from January 2021 to May 2022. Ethyl methylbeneze emissions were below 969.9 lb/yr on a 12 month rolling period.
6. Ethyl toluene - mixture (CAS No. 25550-14-5)	969.9 lb/yr	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance- Records were received from January 2021 to May 2022. Ethyl Toluene emissions were below 969.9 lb/yr on a 12 month rolling period.

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1702(a))

NON-COMPLIANCE- Containers containing waste materials were not covered. EGLE staff alerted Fitzgerald Finishing staff to correct this.

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. (R 336.1205(3), R 336.1224, R 336.1702(a))

Compliance- Coatings were kept in closed containers.

IV. DESIGN/EQUIPMENT PARAMETERS

The permittee shall not operate FG-DIPSPINS unless an RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC capture efficiency of 80 percent (by weight), a minimum VOC destruction efficiency of 95 percent (by weight), maintaining a minimum temperature of 1450°F, and a minimum retention time of 0.5 seconds. (R 336.1205, R 336.1702(a), R 336.1910)

Compliance- Destruction efficiency was tested on May 5-6, 2015. The results were :

RTO destruction efficiency- 99.1%

Capture Efficiency- 86.3%

Overall VOC control efficiency- 85.5%.

The permittee shall not exhaust more than six emission units in FG-DIPSPINS to an RTO at any time. The permittee may bypass the RTO for individual emission units when those emission units are applying coatings which contain less than 0.15 pounds of VOC per gallon (minus water), as applied. (R 336.1205, R 336.1702(a), R 336.1910)

Compliance- Fitzgerald Finishing keeps records on bypass emissions on a daily basis.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

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 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. (R 336.1205, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))

Compliance- Many of the coatings MSDS do not indicate that whether Method 24 was used.

Verification of the VOC capture and destruction efficiency for the RTO for FG-DIPSPINS by testing at the owner's expense, in accordance with Department requirements, may be required. 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. The AQD must approve the final plan prior to testing. Verification of emission rates 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. (R 336.1205, R 336.1702, R 336l.2001, R 336.2003, R 336.2004)

Compliance-Testing occurred in 2015

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205, R 336.1225, R 336.1702)

Compliance- Calculations are performed every day and monthly and there is a summary produced every month for the current month and past 11 months.

The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor and record the temperature on a continuous basis, during operation of FG-DIPSPINS. 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. (R 336.1205, R 336.1702(a))

Compliance- Fitzgerald Finishing maintains a monitor which continuously monitors the combustion temperature of the RTO.

The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, and clean-up solvent, including the weight percent of each component. The data may consist of Material 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. (R 336.1225, R 336.1702)

Compliance- Fitzgerald Finishing maintains a current list of coatings, reducers, and clean up solvents used at the facility.

4. The permittee shall keep the following information on a monthly basis for the FG-DIPSPINS:

a. Gallons (with water) of each coating, reducer, and clean-up solvent used.

b. VOC content (minus water and with water) of each material as applied.

c. Each emission unit operated in bypass mode including the date and bypass times.

d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.

e. 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.

f. Hourly records of emission units connected to the RTO, and the total number of emission units connected to the RTO.

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. (R 336.1205, R 336.1702(a))

Compliance- Fitzgerald Finishing maintains records on gallon usage, VOC content of cleanup solvents, VOC content of each coating, and reducer on a daily basis. At the end of the month the emission data is summarized for the current month plus the new rolling 12 month emission totals are calculated. Fitzgerald Finishing keeps records on bypass emissions on a daily basis.

5. The permittee shall keep the following information on a daily basis for the FG-DIPSPINS:

a. Gallons (with water) of each heavy aromatic solvent naphtha (CAS No. 64742-94-5) containing material used.

b. Where applicable, the gallons (with water) of each heavy aromatic solvent naphtha (CAS No. 64742-94-5) containing material reclaimed.

c. The heavy aromatic solvent naphtha (CAS No. 64742-94-5) content (with water) in pounds per gallon of each material used.

d. Heavy aromatic solvent naphtha (CAS No. 64742-94-5) 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.[1] (R 336.1225(1))

Compliance- Records are being kept for specific component containing material.

6. The permittee shall keep the following information on a monthly basis for the FG-DIPSPINS:

a. Gallons (with water) of each cumene (CAS No. 98-82-8), dibasic ester, ethyl methylbenzene (CAS No. 611 -14-3), and ethyl toluene - mixture (CAS No. 25550-14-5) containing material used.

b. Where applicable, the gallons (with water) of each cumene (CAS No. 98-82-8), dibasic ester, ethyl methylbenzene (CAS No. 611-14-3), and ethyl toluene - mixture (CAS No. 25550-14-5) containing material reclaimed.

c. The cumene (CAS No. 98-82-8), dibasic ester, ethyl methylbenzene (CAS No. 611-14-3), and ethyl toluene - mixture (CAS No. 25550-14-5) content (with water) in pounds per gallon of each material used.

d. Cumene (CAS No. 98-82-8), dibasic ester, ethyl methylbenzene (CAS No. 611-14-3), and ethyl toluene - mixture (CAS No. 25550-14-5) mass emission calculations determining the monthly emission rate in pounds per calendar month.

e. Cumene (CAS No. 98-82-8), dibasic ester, ethyl methylbenzene (CAS No. 611-14-3), and ethyl toluene - mixture (CAS No. 25550-14-5) mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

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.[1] (R 336.1225(1))

Compliance- Records are kept on a monthly basis. Records were received.

VII. REPORTING

Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of the backup RTO for FG-DIPSPINS. (R 336.1201(7)(a))

Compliance- Construction is not complete but facility is aware of notification and testing requirement.

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Compliance Determination
SV-RTO1	36	45	Undetermined- **The stack height and diameter appeared to be the appropriate height and diameter.**
SV-RTO2 (backup)	36	45	
SV-LINE3-BP (bypass)	16	25	
SV-LINE4-BP	16	25	

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Compliance Determination
(bypass)			
SV-LINE7-BP (bypass)	16	25	
SV-LINE8-BP (bypass)	16	25	
SV-LINE9-BP (bypass)	16	40	
SV-LINE10-BP (bypass)	16	40	

IX. OTHER REQUIREMENTS

NA

Footnotes:

[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply Source-Wide to: FGFACILITY

DESCRIPTION: All process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment.

Emission Unit ID: NA

POLLUTION CONTROL EQUIPMENT: RTO1, RTO2

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Compliance Determination
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	Compliance- Emissions are calculated and are below emission limit Compliance- Individual HAPS are calculated and are below 9.0 TPY.
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	Compliance- Aggregate emissions are calculated and are below emission limit Compliance- Aggregate HAPS are calculated and are below 25 TPY.
3. Formaldehyde (CAS No. 50-00-0)	1,283 lb/yr	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance- Formaldehyde emissions are calculated and are below emission limit.
4. Naphthalene (CAS No. 91-20-3)	7,759 lb/yr	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance- Naphthalene emissions are calculated and are below emission limit.

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

The permittee shall determine the HAP content of any material as applied and as received, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. (R 336.1205(3))

Compliance- Fitzgerald Finishing keeps records of the gallons of each HAP containing material each month. Fitzgerald Finishing does not reclaim any HAP containing material. Fitzgerald Finishing keeps track of the HAP content of each HAP containing material used. Fitzgerald Finishing calculates individual and total HAPs on a monthly basis and on a 12 month rolling basis.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(3), R 336.1225)

Compliance- Calculations are being done and were submitted.

2. 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 Material 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. (R 336.1225)

Compliance- Fitzgerald Finishing maintains MSDS for each coating, reducer, and clean up solvents. HAP coating is determined by manufacturer's formulation data. Fitzgerald Finishing maintains a list of all their coatings, reducers, and clean up solvents with VOC content and HAP content.

3. The permittee shall keep the following information on a monthly basis for FGFACILITY:

a. Gallons or pounds of each HAP containing material used.

b. Where applicable, gallons or pounds of each HAP containing material reclaimed.

c. HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.

d. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.

e. Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep 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. (R 336.1205(3))

Compliance- Records are kept and were submitted on request.

4. The permittee shall keep the following information on a monthly basis for FGFACILITY:

a. Gallons or pounds of each formaldehyde (CAS No. 50-00-0) and naphthalene (CAS No. 91-20-3) containing material used.

b. Where applicable, gallons or pounds of each formaldehyde (CAS No. 50-00-0) and naphthalene (CAS No. 91-20-3) containing material reclaimed.

c. Formaldehyde (CAS No. 50-00-0) and naphthalene (CAS No. 91-20-3) content, in pounds per gallon or pounds per pound, of each material used.

d. Formaldehyde (CAS No. 50-00-0) and naphthalene (CAS No. 91-20-3) emission calculations determining the monthly emission rate of each in pounds per calendar month.

e. Formaldehyde (CAS No. 50-00-0) and naphthalene (CAS No. 91-20-3) emission calculations determining the annual emission rate of each in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep 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.[1] (R 336.1225(2))

Compliance- Records are kept and were submitted on request.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

EU-BURNOFF

The burnoff oven was not operating at the time of the inspection. It was installed earlier in the year and has not had a full year of operation.

EMISSION LIMITS

Compliance- The burnoff oven was not operating at the time. AQD has also not received any complaints regarding visible emissions from the surrounding neighborhood.

MATERIAL LIMITS

Compliance- The burnoff oven was not operating at the time, but equipment is only equipped to burn natural gas. Only dip spin baskets are used in the burnoff oven. Records were requested and received.

PROCESS/OPERATIONAL RESTRICTIONS

Compliance- Records were received regarding usage of burnoff oven. It appears that only dip spin baskets with cured paint are being processed in the burnoff oven. As such it doesn't appear that any other items such as the items specified in SC. III.1 and SC III.2 are being processed in the burnoff oven.

DESIGN/EQUIPMENT PARAMETERS

Noncompliance- Recording of the temperature was not continuously monitored.

MONITORING/RECORDKEEPING

VI.1 - Noncompliance. Temperature was not being continuously monitored.

VI.2 – Undetermined- Burnoff oven has not operated for more than a year. Follow up of calibration will be revisited during next compliance inspection.

VI.3- Noncompliance. Temperature records were not recorded.

VI.4- Compliance- Records were received of processing of baskets in the burnoff oven.

VI.5- Undetermined. Records of dip spin baskets processed in the burnoff oven were received. AQD requested determination from facility, but it appears that only cured paint on the dip spin baskets are being processed. Further follow up will occur at next compliance inspection.

VI.6- Compliance. Facility has manufacturer current information regarding the burnoff oven. AQD did not observe burnoff oven operating during the inspection. Facility did not indicate that burnoff oven was having any operational issues.

STACK/VENT RESTRICTIONS

I observed the stack from the outside of the building. It appeared to be the correct height and diameter but I did not take any measurements.

Other equipment not covered in the PTI

The sand blast equipment is exempt under R 336.1285(l)(vi)(B).

The acid tank cleaning (Jessup lines) are exempt under Rule 290. Records are kept and were below emission thresholds.

The boiler is exempt under R 336.1282(b)(i). It has a heat input of less than 10 mmBTU/hr and each was installed before June 1989 and therefore is not subject to the Federal NSPS for boilers. (40 CFR 60 Subpart Dc).

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:

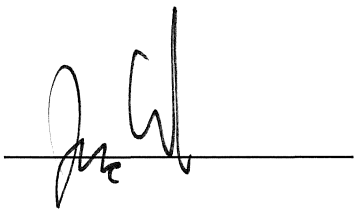
Fitzgerald Finishing is paved.

MAERS REPORT REVIEW

Fitzgerald Finishing submits MAERS every year and is a fee subject facility.

FINAL COMPLIANCE DETERMINATION:

The facility appears to be in noncompliance with PTI 63-21, Special Conditions IV.4, VI.3. A Violation Notice was issued on September 14, 2022.

NAME  DATE 9-12-22 SUPERVISOR April L. Wendling 9-15-22