

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

B425230902

FACILITY: AEP COOK NUCLEAR PLANT		SRN / ID: B4252
LOCATION: ONE COOK PLACE, BRIDGMAN		DISTRICT: Kalamazoo
CITY: BRIDGMAN		COUNTY: BERRIEN
CONTACT: Blair Zordell , Senior Environmental Specialist		ACTIVITY DATE: 08/27/2015
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM 208A
SUBJECT: Do to security protocol, this inspection was scheduled in advance.		
RESOLVED COMPLAINTS:		

On August 27, 2015 AQD staff (Matt Deskins) went to conduct an announced scheduled inspection of the AEP Cook Nuclear Plant (AEP) located in Bridgman, Berrien County. The inspection had to be announced due to security protocol and staff set up the date and time with Blair Zordell who is one of the plants environmental personnel. AEP currently has two nuclear reactors that they started constructing in March of 1969 and Reactor #1 went on line in 1975 and Reactor #2 in 1978. Reactor #1 is capable of producing 1,048 megawatts of electricity and Reactor #2 1,107 megawatts. AEP also has a small boiler and numerous emergency diesel fired generators. The facility currently has three PTIs (260-03B, 460-93A, and 34-05) issued to them by the AQD for the boiler and the various diesel fired generators. AEP has historically been a 208a registered facility which means they would certify annually that their actual emissions were at 50% or lower than major source thresholds. In the past year or so a decision was made to rescind the rule regarding 208a registrations and facilities that were using it had to either prove they were a true minor source, apply for an Opt-Out Permit, or submit a Title V ROP Application within a year of the rule being rescinded. AEP made the decision to apply for a Title V permit and will be submitting an application because they don't want any operational restrictions in case of an emergency. The intent of the inspection was to determine the facilities compliance with the aforementioned permits as well as any other state or federal air regulations. Staff departed for the facility at approximately 8:50 a.m.

AQD staff arrived at the plant entrance of the plant at approximately 10:10 a.m. Staff then proceeded to call Blair to let him know staff had arrived and was proceeding to the guard entrance. Blair said he would meet staff in the visitor parking area which was now on the left hand side instead of the right down by the plant. Staff then stopped at the guard entrance to introduce them self and provide identification to the guard who made sure we were expected that day. After the guard confirmed staff's appointment and checked things out, staff was allowed to proceed and parked in the visitor parking area. After exiting the vehicle, staff proceeded to the sidewalk where a couple of people were standing. One of them asked if staff was with the DEQ which staff confirmed and asked if he was Blair Zordell which he was. After introductions staff explained to Blair what our inspections entail, what equipment staff would like to see, and then review the records required to be kept by their three air permits. Staff was then going to give him a copy of the DEQ's Environmental Inspection Brochure but he said he already had one from a DEQ inspection the previous day. He said that Chris Bauer of the DEQ's Water Resources Division had been there. Staff then gave him a copy of the DEQ Boiler MACT Brochure. Staff mentioned that there are new federal regulations regarding boilers and the brochure provides good reference materials to see what they might be subject to. Blair sounded like he was aware of the regulation and that Dave Long (AEP Principal Environmental Engineer) should be aware of it as well.

Before proceeding to the high security area to gain entry into the main portions of the plant, Blair asked if staff would like to look at the two emergency generators that are housed outside this area. This would save some time do to various security procedures once you enter the main plant. Staff said that was fine and we proceeded over to that area. According to Blair, all the diesel fired generators at the facility are stand-by units that are only used for emergency purposes. He said that they are automatically tested once per month to make sure they function properly. The two generators in this location are Caterpillar 3516s and were installed in 2005 under PTI No. 34-05 (General Permit). They are rated at 2.5 megawatts each and both are equipped with their own 4,000 gallon diesel fuel tanks built underneath them. Each engine has its own digital fuel use gauge as well. The engines were not in operation while staff was present.

Staff then proceeded with Blair into the main buildings of the plant. Prior to this, staff had to go through several different security checkpoints which included reading and signing off on security procedures, going through metal detectors, etc. This process took about 45 minutes to complete. Once this was completed, staff proceeded with Blair up to Jon Harner's office because Blair wanted to introduce staff to him. Jon is Blair's

boss and the following is a short summary of discussions staff had with Blair and/or Jon. As mentioned earlier, the main facility operations revolve around the two nuclear reactors. The facility encompasses 650 acres with 35 acres making up facility operations. The facility uses Lake Michigan water for non-contact cooling water and they have 3 intakes and 2 discharge pipes. The facility employs approximately 1,000 AEP workers, 500 contract workers, and upwards of 3,000 workers altogether during any facility shutdowns. Staff asked about the educational center that hasn't been used for quite a few years due to security reasons and if it could ever be re-opened. Jon said that they were currently trying to have it re-opened and they are awaiting/hoping for approval from the Nuclear Regulatory Commission (NRC) to do so. Staff then thanked Jon for his time and departed with Blair to look at the various other permitted equipment.

Our first stop was where the 235 mm/btu/hr boiler was. As mentioned earlier, this boiler has been rendered inoperable and is considered abandoned in place by the facility.

Our next stop was at the locations that house the four 35.08 mm/btu/hr diesel fired emergency generators installed under PTI 460-93A. As mentioned previously, this permit was modified in 2014 to remove the conditions that applied the 235 mm/btu/hr boiler. Blair and staff couldn't gain access to any of the engine rooms because there was a flashing strobe with a warning stating guarded equipment. According to Blair, the emergency generators are the 2nd most guarded equipment next to the reactors. Blair said he would make some phone calls to see what was going on and if he could gain access. He stated this wasn't supposed to be an issue that day.

Our next stop on the way back to Blair's office was outside to look at the 28.56 mm/btu/hr diesel fired boiler. It was installed under PTI No. 260-03B and was manufactured by Bulldog Boilers. It wasn't in operation during staff's inspection and Blair said that they don't use it during the summer. Staff then proceeded with Blair back to his office. Once there, Blair contacted security about gaining access to the generator rooms and staff looked over records. Staff will discuss the various permits, their special conditions, and staff's comments to them later.

After Blair was able to get us access to the generator rooms and staff reviewed records, we proceeded back to that area of the plant. Staff looked at all four of the diesel fired generators which were installed in 1971. Each one was rated at 3.5 megawatts each and manufactured by Woodward-Worthington. The 1st two sets we looked at were designated AB and CD "Orange" which references the color they are painted. AB had 3,298.5 hours on it and CD had 3,363.9 hours on it. Neither was in operation during the inspection. The 2nd two sets we looked at were designated AB and CD "Blue". AB had 2,846.7 hours on it and 539.2 hours on it. Neither of these were in operation.

Staff then proceeded with Blair back to security and through check out. Once staff was processed through they proceeded with Blair to a building that houses their paint booth operations. The painting operations were observed just prior to staffs departure because it was located on the way out of the facility. Please see Rule 287 (C) comments toward the end of this report. After looking at the equipment, staff drove Blair back up to the plant, thanked him for his time, and departed at approximately 1:50 p.m.

The following lists the various permits, their special conditions, and the facilities compliance with them. Also, after the permit conditions, staff will discuss their painting operations and their compliance with the AQD Rule 287(c) permit exemption.

The following are the Special Conditions and AQD comments relating to PTI No. 260-03B for a 28.56 mm/btu/hr portable boiler.

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EUBOILER1	28.56 MMBTU/hr fuel oil-fired boiler	NA	NA
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

The following conditions apply to: EUBOILER1

DESCRIPTION: 28.56 MMBTU/hr fuel oil fired boiler

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. SO ₂	0.31 lb/MMBTU ¹	Test Protocol	EUBOILER1	GC 13, SC II.1, SC VI.1	R 336.1401
2. SO ₂	20 tpy	12-month rolling time period as determined at the end of each calendar month.	EUBOILER1	SC VI.2, SC VI.5	R 336.1205(1)(a)(ii)(D), R 336.1401, 40 CFR 52.21(c) & (d)
3. NO _x	0.15 lb/MMBTU	Test Protocol	EUBOILER1	GC 13	R 336.2803, R 336.2804
4. NO _x	11 tpy	12-month rolling time period as determined at the end of each calendar month.	EUBOILER1	SC VI.2, SC VI.5	R 336.1205(1)(a)(ii)(D), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
5. Arsenic	0.00084 pph	Test Protocol	EUBOILER1	GC 13	R 336.1225

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
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¹Equivalent to using fuel oil with a 0.30% sulfur content and higher heating value of 136,000 BTU/gallon.

AQD Comment: Appears to be in Compliance with all the above. The AQD has not requested testing to demonstrate compliance with 1, 3, and 5 above. Records reviewed by staff of the most recent 12-month rolling time period ending in July 2015 indicated SO₂ emissions at 0.02 tons for #2 above and NO_x at 0.28 for #4 above.

6. Visible emissions from EUBOILER1 shall not exceed a six-minute average of 20 percent opacity, except as specified in R 336.1301(1)(a). (R 336.1301, R 336.1331, 40 CFR 60.43c)

AQD Comment: Appears to be in Compliance. The boiler wasn't operating during the inspection and VEs don't appear to be an issue.

II. MATERIAL LIMITS

1. The sulfur content of the No. 2 fuel oil added to the blended fuel for EUBOILER1 shall not exceed 0.30 percent by weight. (R 336.1201(3), R 336.1225, R 336.1401, R 336.1901)

AQD Comment: Appears to be in Compliance. The facility doesn't use blended fuel anymore and the sulfur content of their fuel deliveries is 15 ppm or 0.0015%.

2. The permittee shall not add to the blended fuel oil tanks for EUBOILER1 any hazardous waste (as defined in state or federal law) or specification recycled used oil (RUO) containing any contaminant that exceeds the following concentrations from the standards specified in the following table. (R 336.1201(3), R 336.1225, R 336.1401)

Contaminant	Limit	Units
Arsenic	5.0	ppmw
Cadmium	2.0	ppmw
Chromium	10.0	ppmw
Lead	15.0	ppmw
PCBs	1.0	ppmw
Total Halogens	1000.0	ppmw
Sulfur	0.3	Weight %

AQD Comment: Appears to be in Compliance. Staff was told that they haven't used any RUO in quite a number of years and don't plan on using it again. They have their used oil taken off site now.

3. The blended fuel usage rate shall not exceed a maximum of 210 gallons per hour and shall not exceed a maximum usage rate of 919,800 gallons per calendar year. (R 336.1205, R 336.1225, R 336.1401)

AQD Comment: Appears to be in Compliance. Staff was told that they haven't used any RUO in quite a number of years and don't plan on using it again. They have their used oil taken off site now.

4. The specification RUO added to the blended fuel shall not exceed 10,000 gallons per calendar year. (R 336.1205, R 336.1225, R 336.1401, R 336.1702(a), R 336.1901)

AQD Comment: Appears to be in Compliance. Staff was told that they haven't used any RUO in quite a number of years and don't plan on using it again. They have their used oil taken off site now.

5. The facility shall not use any specification RUO from an off site source. (R 336.1205, R 336.1225)

AQD Comment: Appears to be in Compliance. Staff was told that they haven't used and RUO in quite a number of years and don't plan on using it again. They have their used oil taken off site now.

6. The specification RUO shall be blended with No. 2 fuel oil prior to use in EUBOILER1 to the limits specified in the following table. (R 336.1205, R 336.1225)

Contaminant	Limit	Units
Arsenic	0.50	ppmw
Cadmium	0.20	ppmw
Chromium	0.20	ppmw

AQD Comment: Appears to be in Compliance. Staff was told that they haven't used and RUO in quite a number of years and don't plan on using it again. They have their used oil taken off site now.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The SO₂ emission limits shall apply at all times including periods of start up, shut down, and malfunctions. (R 336.1205, R 336.1401)

AQD Comment: Appears to be in Compliance. Equipment is hardly used.

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

1. The permittee shall sample specification RUO prior to the addition to the blend tanks. (R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)

AQD Comment: Appears to be in Compliance. Staff was told that they haven't used and RUO in quite a number of years and don't plan on using it again. They have their used oil taken off site now.

2. The permittee shall sample blended fuel oil after each addition of specification RUO to the blend tanks. Sampling of the blended fuel shall not be required if the sampling results of the specification RUO are below the blend limits specified in SC II.6. (R 336.1205, R 336.1225)

AQD Comment: Appears to be in Compliance. Staff was told that they haven't used and RUO in quite a number of years and don't plan on using it again. They have their used oil taken off site now.

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep records of, in a satisfactory manner, the maximum sulfur content, density, and higher heating value of the fuel from each supplier. If supplier certification is used for this purpose, records of certification must contain the name of the supplier and a statement from the supplier that the oil complies with the requirements of 40 CFR 60.48c. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.1901)**

AQD Comment: Appears to be in Compliance. The facility keeps documentation on fuel deliveries and certifications regarding the above.

2. The permittee shall monitor, in a satisfactory manner, the blended fuel oil usage for EUBOILER1 on a monthly and a calendar year time period basis. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.1901)**

AQD Comment: Appears to be in Compliance. Staff was told that they haven't used any RUO in quite a number of years and don't plan on using it again. They have their used oil taken off site now.

3. The permittee shall monitor, in a satisfactory manner, the RUO addition rate for EUBOILER1 on a monthly and a calendar year time period basis. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.1901)**

AQD Comment: Appears to be in Compliance. Staff was told that they haven't used and RUO in quite a number of years and don't plan on using it again. They have their used oil taken off site now.

4. The permittee shall keep in a satisfactory manner, calculated on a monthly basis, 12-month rolling time period emission calculation records of SO₂ and NO_x for EUBOILER1. All records shall be kept on file and made available to the Department upon request. **(R 336.1205(1)(a))**

AQD Comment: Appears to be in Compliance. The facility didn't currently have this information set up in a 12-month rolling format, but we were able to calculate it. Staff made Blair aware of the recordkeeping requirement.

5. The permittee shall keep records of, in a satisfactory manner, the Arsenic, Cadmium, and Chromium concentrations in the blended fuel oil tanks as required per SC V.2. All records shall be kept on file and made available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1901)**

AQD Comment: Appears to be in Compliance. Staff was told that they haven't used and RUO in quite a number of years and don't plan on using it again. They have their used oil taken off site now.

VII. REPORTING

1. The permittee shall provide written notification of construction and operation to comply with the federal Standards of Performance for New Stationary Sources, 40 CFR 60.7. The permittee shall submit this notification to the AQD District Supervisor within the time frames specified in 40 CFR 60.7. **(40 CFR 60.7 Dc)**

AQD Comment: Appears to be in Compliance with the above and with the requirements of Subpart Dc. The facility tracks fuel usage for the boiler, has documentation showing sulfur content of the fuel is below 0.5% by weight, and they were not required to do any performance testing on opacity since the unit is under 30 mm/btu/hr.

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)	Underlying Applicable Requirements
1. SVBOILER1	24	22	R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

AQD Comment: Appears to be in Compliance. The stack appears to meet the above dimension and height.

IX. OTHER REQUIREMENTS

NA

The following are the Special Conditions and AQD comments relating to PTI No. 460-93A for four 3500 kilowatt emergency generators. This permit was modified in 2014 to remove the conditions of a 235 mm/btu/hr boiler that was rendered inoperable and abandoned in place.

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EU1ABEDG	150AB emergency diesel generator engine 35.088 MMBtu/hr heat input	1/1/1971	FGEMERDIESELS
EU1CDEDG	150CD emergency diesel generator engine 35.088 MMBtu/hr heat input	1/1/1971	FGEMERDIESELS
EU2ABEDG	150AB emergency diesel generator engine 35.088 MMBtu/hr heat input	1/1/1971	FGEMERDIESELS
EU2CDEDG	150CD emergency diesel generator engine 35.088 MMBtu/hr heat input	1/1/1971	FGEMERDIESELS

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
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Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGEMERDIESELS	Grouping of all four on-site diesel-fired emergency generator engines.	EU1ABEDG EU1CDEDG EU2ABEDG EU2CDEDG

The following conditions apply to: FGEMERDIESELS

DESCRIPTION: Grouping of all four on-site diesel-fired emergency generator engines.

Emission Units: EU1ABEDG, EU1CDEDG, EU2ABEDG, EU2CDEDG

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. SO ₂	0.33 lb per million BTU heat input*	24-hour average	EU1ABEDG EU1CDEDG EU2ABEDG EU2CDEDG	GC 13	R 336.1401 40 CFR 52.21(c)&(d)

* This is equivalent to using oil with a 0.3% sulfur content and a heat value of 18,000 BTUs per pound.

AQD Comment: Appears to be in Compliance. The AQD has not requested any testing to date.

2. Visible emissions from the emergency generators in FGEMERDIESELS shall not exceed a 6-minute average of 20% opacity, except as specified in Rule 301(1)(a). (R 336.1301)

AQD Comment: Appears to be in Compliance. The equipment was not operating during staff's inspection and VEs haven't been an issue.

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. Applicant shall not operate the emergency generators in FGEMERDIESELS when electric power is available, except during periods of maintenance checks and operator training. **(R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d))**

AQD Comment: Appears to be in Compliance. Staff was told that these are strictly used when power is lost and they were not operating during staff's inspection.

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

The following are the Special Conditions and AQD comments relating to General PTI No. 34-05 for two 2.5 megawatt diesel generators. The general permit is applicable to one or more diesel fuel fired reciprocating engine generators with a maximum rated operating capacity of 5 megawatts or less.

Emission Limits

- 1.1) The NOx emission limit for FG-ENGINES shall not exceed 515 pounds per 1000 gallons of fuel.

AQD Comment: Appears to be in Compliance. Testing has not been requested so we'll have to assume that this requirement would be met.

Material Usage

1.2) The permittee shall burn only diesel fuel in FG-ENGINES.

AQD Comment: Appears to be in Compliance. The engines only burn diesel fuel according to the facility.

1.3) If any electricity produced by FG-ENGINES is sold to a utility power distribution system, the sulfur content of the diesel fuel shall not exceed 0.05 percent by weight on an annual average.

AQD Comment: Appears to be in Compliance. These engines are only used during emergencies to supply power to the plant.

1.4) The combined fuel use for all units included in FG-ENGINES shall not exceed 136,000 gallons per 12 month rolling time period.

AQD Comment: Appears to be in Compliance. Records reviewed indicated a 12 month rolling average (August 2014 through July 2015) amount used of 3,022 gallons.

Process/Operational Limits

1.5) The permittee shall operate FG-ENGINES in accordance with manufacturer's recommendations for safe and proper operation to minimize emissions during periods of startup, shutdown, and malfunction.

AQD Comment: Appears to be in Compliance. The engines appear to be in excellent condition and staff will assume they are maintaining them properly.

1.6) The total capacity from each unit included in FG-ENGINES shall not exceed 5 megawatts.

AQD Comment: Appears to be in Compliance. The two engines installed to date under this general PTI are both rated at 2.5 megawatts.

Testing

1.7) Verification of the NOx emission limit (515 pounds per 1000 gallons of fuel used) from one or more representative units of FG-ENGINES may be required. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD for approval. Verification of emission factor includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.

AQD Comment: Appears to be in Compliance. To date, the AQD has not requested that the engines be tested.

Monitoring

1.8) The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the fuel use for FG-ENGINES on a monthly basis.

AQD Comment: Appears to be in Compliance. Both engines are equipped with digital fuel use gauges and staff will have to assume they are maintaining and calibrating them properly.

Recordkeeping/Reporting/Notification

1.9) The permittee shall keep, in a satisfactory manner, records of the date, duration, and description of any malfunction, any maintenance performed, and any testing results for FG-ENGINES.

AQD Comment: Appears to be in Compliance. These engines hardly get used but they do have a computerized maintenance log where these items get inputted.

- 1.10) If any electricity produced by FG-ENGINES is sold to a utility power distribution system, the permittee shall keep records of the sulfur content calculated in percent by weight on an annual average as required by SC 1.3.

AQD Comment: Appears to be in Compliance. These engines are only used during emergencies to supply power to the plant.

- 1.11) The permittee shall keep in a satisfactory manner, monthly and 12 month rolling time period fuel use records for FG-ENGINES. The records must indicate the total amount of fuel used in FG-ENGINES.

AQD Comment: Appears to be in Compliance. The facility didn't have this information in a 12-month rolling format, but staff made them aware of it.

Stack/Vent Restrictions

- 1.12) The exhaust gases from FG-ENGINES shall be discharged unobstructed vertically upwards to the ambient air.

AQD Comment: Appears to be in Compliance. The engines do have hinged ran caps on their exhaust stacks but staff would assume that these would be fully open during operation and not obstruct exhaust flow.

Miscellaneous/Allowed Modification

- 1.13) The permittee shall not replace or modify FG-ENGINES, or any portion of FG-ENGINES, unless all of the following conditions are met:
- a) The permittee shall update the general permit by submitting a new Process Information form (EQP5787) to the Permit Section and District Supervisor identifying the existing and new equipment a minimum of 10 days before the equipment is replaced or modified.
 - b) The permittee shall continue to meet all general permit to install applicability criteria after the replacement or modification.
 - c) The permittee shall keep records of the date and description of the replacement or modification.

AQD Comment: Appears to be in Compliance. To date, the facility has not replaced, added, or modified any of the engines installed under this general PTI.

Rule 287(c) Exemption for their Painting Operations

As mentioned previously, prior to departing the facility staff went with Blair to check out the building that houses their painting operations. Staff noted that the building consisted of a sand blasting unit, a paint booth, and a drying oven. None of the equipment was in use. The sand blasting unit exhausts outside but has a baghouse for particulate collection. The paint booth was equipped with filters on the exhaust vents. Records reviewed earlier by staff indicated paint usage under 5 gallons per month. These totals are well under the 200 gallon per month requirement for a permit exemption under Rule 287(c).

Facility Compliance Status: Appears to be in COMPLIANCE. The facility appears to be meeting the requirements contained in their three permits, the AQD Rule 287(c) permit exemption, and all other air regulations that the AQD can enforce. Please note that staff did not make any compliance determinations regarding any potential 40 CFR Part 63 Subpart ZZZZ (RICE MACT) or 40 CFR Part 63 Subpart JJJJJJ (Boiler MACT) regulations that may apply to the facility since the AQD is not presently designated by the EPA to enforce these regulations at area sources of HAPs.

NAME Matt Dahl

DATE 8-31-15

SUPERVISOR MD 9/2/2015