

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

B585426952

FACILITY: Romeo RIM, Inc.		SRN / ID: B5854
LOCATION: 74000 Van Dyke Avenue, ROMEO		DISTRICT: Southeast Michigan
CITY: ROMEO		COUNTY: MACOMB
CONTACT: Wade Spurlin, Environmental Coordinator		ACTIVITY DATE: 09/17/2014
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On September 17, 2014, at about 11:00 AM, Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) staff Samuel Liveson and Sebastian Kallumkal conducted an un-announced annual targeted inspection at Romeo RIM, Inc. located at 74000 Van Dyke Avenue, Romeo, Michigan.

The purpose of the inspection was to verify facility's compliance with requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994 and the Renewable Operating Permit (ROP) No.: MI-ROP-B5854-2009, and Permits to Install 365-08A for Pacific Reaction Injection Molding (RIM 45) press and 144-10-for FGSHUTTLECLAMP (high gloss) process. Upon request by the permittee AQD voided PTI No.: 356-08 for Polyurethane Finish Stone Process on January 21, 2014.

The facility produces reaction injection molded (RIM) plastic parts for trucks and fleet type vehicles (bumpers), and some John Deere products. Various sized "clamps" are used to mold these plastic parts. The primary parts produced are engine covers, bumpers and storage pallets. Some parts are coated by in-mold painting (IMP) while some other parts are coated after being molded and using spray guns in paint booths. Plastics processed are polyurethane and dicyclopentadiene (DCPD). When DCPD is used no mold release agent or IMP is used. When polyurethane is processed mold release agents are used and IMP may be used. Facility's processes are subject to Rule 632 for coating of plastic parts.

The facility has two plants. Plant No. 1 has 9 RIM booths, 2 paint spray booths, and sunshade/moon roof manufacturing and assembly process. The new High Gloss In-Mold Paint Long Fiber Injection (HGIMP-LFI) process a.k.a. Shuttle Clamp Process is performed in a new building adjacent to Plant 1. The Plant 2 has one paint spray booth and 4 RIM booths including the recently installed RIM 45. AQD has not received any odor complaints against the facility for the last few years.

Facility's coating operations are also subject to 40 CFR 63, Subpart PPPP-NESHAP for Surface Coating of Plastic Parts and Products.

At the facility we met Mr. Wade Spurlin, Environmental & Safety Coordinator and Mr. Paul Barick, Director of Quality, Environmental Management & Safety. We introduced ourselves and stated the purpose of the inspection. During the pre-inspection meeting, we discussed the facility's operations and changes at the facility. Facility had removed Clamp No. 2 (EU-PLT1-IMP2) and Clamp No. 3 (EU-PLT1-IMP3), and Paint Coating Line 3 (EU-PLT1-LINE3) and Paint Coating Line 4 (EU-PLT1-LINE4). Paint Coating Line 5 (EU-PLT1-LINE5), and Paint Coating Line 6 (EU-PLT1-LINE6) and the batch oven are in the process of being dismantled. Carbon Adsorber Unit CA NO.1 which controlled emissions from Line 3 and Line 4 is also being dismantled. The carbon has been removed from the unit. The staining process which was done in Plant 1 Line 6 has been moved to a stand-alone self-containing booth near the LFI units. The air inside the booth is recirculated. Staining is done to coated plastic parts.

Facility does not want to update the ROP renewal application for these changes because the dismantling has not been complete.

Facility is in the process of installing a mold splitter to clean the molds. They have no intention of using this splitter as clamps while other clamps are repaired.

INSPECTION:

After the pre-inspection meeting, they accompanied us for an inspection of the facility. Initially we paint booths 1-6 and the carbon adsorption unit. We observed that painting is done in Paint Booth Line 1 and Line 2. The booth filters appeared to in place. The operator told me that the first stage filters are replaced on a daily basis and the second stage filters are replaced on a weekly basis. Booth 3 and 4 we dismantled. Booths 5 and 6 used as storage areas currently but they would be dismantled soon. The batch oven is being removed. All the carbon from the Carbon Adsorption unit has been removed. The operator collected a sample of the coating from the paint pot for AQD analysis. I also collected MSDS for this coating. The paint booth operator told us that the coating as applied contains catalyst and it would solidify is taken from the paint gun.

Next, we inspected the RIMs in the Plant 1. The operator collected coating samples from RIM F-90 (EU-PLT1-IMP5), Amesbury (EU=PLT1-IMP6) and LFI 4 (EU-PLT1-IMP24) and collected MSDS for these coatings. The filters in some of the inspected clamps appear to be in place and good shape. F-90 and Amesbury was operating. LFI 1, 2, and 3 were not operating. The operators told us that filters are replaced on a regular schedule. However I observed that some of the filters behind the LFI 4 and LFI 5 clamps in their respective booths were missing. LFI 4 was operating, but LFI 5 was not operating at the time of my inspection. I pointed out this problem to Mr. Barick. He acknowledged the problem and offered to find out about what happened. We also inspected the staining booth. The stain is a water based coating which is applied to plastic parts after in-mold painting.

Next we inspected the shuttle clamp. The process is also called a "double shuttle" process which means that two parts can be manufactured during each cycle. The process has one top clamp (fixed in the middle room) and two bottom clamps. Each located inside one of the two spray booths. The mold release will be manually sprayed to the mold. Then a paint mixed with a catalyst will then a paint mixed with a catalyst will then be applied to the interior of the mold using robotic HVLP applicators. The mold is moved to the top clamp where two part resin mixture mixed with long fibers is injected into the mold. The injection of the two part resin and fiber is called a "shot". After this the mold is opened, and moved back to the booth where the part is removed, undergo finishing operations such as sanding, trimming, drilling, etc.

The process was not operating at the time of our inspection.

Next we inspected Plant 2. The RIM 42 (Clamp 5x7) was used on that day even though it was not used during our inspection, RIM 43 (clamp 11x6), RIM 44 (10 x12) and RIM45 (11x14) was down for tool change. The filters appeared to be in good shape and in place. We also inspected EU-PLT2-LINE1 and had the operator collect a coating sample. I also collected MSDS for the sample. The operator informed us that the filters in both stages are changed on a weekly basis.

We inspected carbon adsorber unit CA No. 2 which controls the exhausts from RIM 42 and 43. They told us that CA No. 2 was not used at the time because RIM42 and 43 were not being used. CA No. 3 which controls emissions from RIM 44 was in an elevated location, so we did not inspect it. They told us that VOC emissions are monitored using the portable analyzer as required.

During the post inspection meeting, we discussed the records for the facility. All records are kept electronically. They offered send all the record electronically. I obtained a paper copy of the Shift Safety Inspection Check-List for the clamps AMES and FORD 90. Facility keeps this check-list for each clamp which includes a check on the condition of the filters. On Monday, September 22, 2014, AQD received electronic records from the facility. Discussions of the requirements are given below under each emission group and flexible group.

Compliance Evaluation:

Table E-1.1 EG-PLT2-LINE1:

Plant No. 2 Spray Coating Line 1 consisting of one paint spray booth, one flash-off area, one bake oven, and parts-wiping (done prior to coating). This line was using acetone for purge and had post-mold paint storage and mixing room. The exhaust filters control particulate matter emissions from the booth.

Wade told us that the booth is used more frequently than before. The booth was not being used at the time of the inspection. The filters were in place and in good condition.

Volatile Organic Compounds (VOC) emission rates:

The facility keeps monthly records of type of coating, coating usage, VOC content in pounds per gallon of coating (minus water), as applied, hours of operation, VOC emissions per hour, month and annual, etc. The 12-month records from August 2013- July 2014, show that the hourly VOC emission rates were below 6.0 lb/hr (permit limit) and were in compliance. The highest hourly emission rate was 0.50 lb which occurred in July 2014.

The total annual VOC emission rate was 0.71 tons per year (tpy) which in compliance with 18.7 tpy (permit limit).

The records show that the VOC content of the coating was in compliance with the ROP limit 3.9 lb VOC/gal of coating-water. The facility only coats one type of parts in this booth and uses the same coatings (T01610001XXA-Polane P, Conductive Primer, Black, E67BC1704, Volvo and T01620001XXX-Solvent Blend-Compliance Thinner, Reducer). Verified the information with the production informed provided by the facility September 22, 2014.

Acetone: The records show that the hourly acetone emissions from the line purge process were 0.04 lb/hr and are below the permit limit of 0.6 lb/hr during July 2013-July 2014.

The records show that the 12-month rolling time period acetone emissions from Line Purging Process were 0.05 tpy which is in compliance with the permit limit (1.7 tpy).

Monitoring & Recordkeeping:

The exhaust filters are installed in the booth properly. The facility is using HVLP or equivalent spray guns to apply coatings. The Facility is keeping adequate monthly records for each coating sprayed, the total hours of operation, the parts-wipe process, the monthly VOC emission calculations, acetone used and reclaimed, and acetone emission rates. He informed us that the facility is keeping a current listing of the chemical composition of each coating used. Facility is currently using the information from Material Safety Data Sheet and other manufacturer's information to calculate VOC emissions.

The facility appears to be replacing the exhaust filters according to the schedule specified in Appendix 3.1. The booth filters were in good condition and in place during my inspection. The booth is not often used. The records regarding monitoring of the filter conditions as specified in Appendix 4 was provided.

During the inspection, I observed drums of solvent and wipe-rag waste kept at the facility. They were all covered.

Table F-1.1: FG-PLT1-RIM-IMP:

This flexible group includes the Plant 1, Reaction Injection Molding processes with mold release and In-Mold Painting (Clamp No. 2, 5, 6, 12, 24, 26, 28, 29 and 50) with seven paint and mold release mix rooms and a storage room.

During the inspection of the facility I observed that some of the clamps are equipped with booth exhaust filters. They were not excessively dirty and were not out of place. The filters behind the Clamp in LFI 4 (EU-PLT1-IMP29) and LFI 5 (EU-PLT1-IMP24) appeared to be missing. This is a violation of the SC III.1. A Notice of Violation would be send to the facility. See the discussion above. LFI 4 was used at the time of inspection, but LFI 5 was not operating.

Volatile Organic Compounds:

The emission rate is limited to 42.25 lb/hr and 69.06 tpy based on a 12-month rolling time period determined at the end of each calendar month. From the submitted records, the highest hourly emission rate (lb/hr) is 11.43 (July 2013) and annual emissions were 32.89 tons. The facility is in compliance with these limits. The records show that the VOC contents of the coatings (lb VOC/gal coating-water) are in compliance with Rule 632(20), Table 66 limits.

Monitoring & Recordkeeping:

Exhaust filters were installed in the RIM booths. Facility is keeping adequate records of material usage, chemical composition and VOC calculations. Facility is keeping number of hours of operation on a monthly basis and is calculating average hourly VOC emission rate based on the total monthly hours of operation. The facility is calculating VOC emission rates on a monthly and yearly basis.

The facility appears to be replacing the exhaust filters according to the schedule specified in Appendix 3.1. The RIM exhaust filters were in good condition and in place during my inspection. The records regarding monitoring of the filter conditions as specified in Appendix 4 was provided.

Testing/Recordkeeping: Facility's coating supplier is conducting random testing of non-water borne (solvent) coatings, as applied, for the VOC content, solid and density. Facility is allowed to use these results to show compliance with testing/sampling requirements.

Table F-1.2: FG-PLT1-SCL1256 and SCL34:

Plant No. 1: Post-Applied Paint. Plastic parts coating operations currently consists of two coating lines (Lines 1 and 2), 1 bake curing oven and parts wiping prior to coating. These booths have two stage exhaust filters for particulate control. The carbon adsorption system which controlled VOC emissions from booths 3 & 4 was removed. See discussion above. The flexible group also consists of post mold paint storage and mixing room.

Booths 5&6 were used for spot staining parts. This operation is currently moved into a self-containing coating booth.

Volatile Organic Compounds (VOC) and Acetone (from paints):

The total combined VOC and Acetone emission rate from this flexible group is limited to 31.7 tons based on a 12-month rolling time period as determined at the end of each calendar month. The records show that the annual combined VOC and Acetone emission rate is 14.53 tons as of July, 2014. Annual combined VOC and Acetone emissions were 14.99 TPY in 2013.

The records show that VOC content of the coatings is below the limit specified in Rule 632, Table 66 (Base, Red/black/other, high bake) for September 2012-July 2014.

VOC and Acetone (Clean up & Purge only):

The total combined VOC and Acetone emission rate from the clean up and purge solvent usage generated from this flexible group is limited to 8.3 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. The records show the calculated emission rate is 0.47 tons for August 2013-July 2014. The records show that the recovery rate is about 90% of the purge solvents.

Monitoring & Recordkeeping:

Facility is keeping adequate records of coating identification, gallons of coating materials used, monthly & 12-month rolling VOC and Acetone emission rates for all coating lines combined, hours of operation, and VOC emission limit calculations pursuant to Rule 632. Mr. Wade informed me that the facility use mostly solvent based coatings. But they calculate with and without water VOC calculations, when applicable.

The facility is keeping adequate records for the purge and clean up solvents. The facility is maintaining a list of material safety data sheets for the materials used in coating. Facility has not analyzed the VOC content of the materials. The information is provided to the facility by the supplier.

The facility is required to keep records of the condition of the exhaust filters in the booths on a daily basis using an approved format in Appendix 4. Facility is keeping manual records for the booths. However the format does not specify whether booth filters are changed or not and the dates of replacements. The format would be modified during ROP renewal to include frequency of stage 1 and Stage 2 filter replacement.

They informed us that the facility is replacing the booth exhaust filters as outlined in Appendix 3.1. Facility has developed and implemented the periodic monitoring program for each carbon adsorption system. However Plant 1 Carbon system has not been used for many years and thus the carbon has not been replaced for long time. The attached records show filter change for paint booth.

Testing/Recordkeeping: Facility's coating supplier is conducting random testing of non-water borne (solvent) coatings, as applied, for the VOC content, solid and density. Facility is allowed to use these results to show compliance with testing/sampling requirements.

During the inspection, I observed drums of solvent and wipe-rage waste kept at the facility. They were all covered.

Table F-1.3: FG-RIMPROCESS: Located in Plant 2-three reaction injection molding (RIM) presses 100 ton (clamp 5x7, RIM42), 120 ton (clamp 11x6, RIM43) , and 300 tons (Clamp 10x12, RIM44) which process dicyclopentadiene (DCPD) and polyurethane containing materials. When DCPD containing materials are processed, no mold release agent and in-mold coating (IMP) are used. When polyurethane containing materials are processed, mold release agents are used and in-mold coatings may also be used. When DCPD containing materials are processed, the VOC emissions are controlled by carbon adsorption systems which include two banks of particulate filters (in series) followed by two banks of carbon filter banks (in series). Electrostatic applicators are used for the application of the in-mold coatings. Acetone and/or VOC containing solvents are used for purge and cleanup (EU-CLEANUP). No acetone/VOC purge and cleanup activities take place within the three press enclosures. Carbon adsorber No.2 (CA No.2) controls exhaust from EU-PLT2-RIM42 and EU-PLT2-RIM43. Carbon adsorber No.3 (CA No.3) controls exhaust from EU-PLT2-RIM44.

During the inspection, none of the Plant 2 RIMs was in operation. Only RIM42 was operated earlier, but DCPD was not used. So the exhaust was not vented to CA No. 2. RIM 43 and RIM 44 were not used. So the CA No. 3 was not in operation. The CA No. 3 was raised from the ground and was not easily accessible. The CA system No. 2 and CA No.3 are equipped with pressure drop measuring gauges. VOC measurement using the portable analyzer was not performed because none of the carbon filter systems were in operation. They told me that the VOC emissions are monitored regularly.

The records show that the DCPD usage is less than 1770 lb/hr (the highest usage was 160.88 lb/hr in December 2013). I observed that the exhaust filters installed and maintained properly.

Volatile Organic Compounds (VOC)

The VOC emissions from each RIM process EU-PLT2-RIM42 and EU-PLT2-RIM 43 is limited to 15 TPY based upon a 12-month rolling period as determined at the end of each calendar month. VOC emission from RIM 42 and RIM 43 were 0.41 TPY and 2.82 TPY respectively in 2013 and 0.24 TPY and 2.13 TPY respectively as of July 2014. VOC emissions from RIM 44 were 5.59 TPY in 2013 and 5.20 TPY as of July 2014, which are in compliance with the limit of 20 TPY.

The VOC content of the coating is limited to 4.80 lb/gal (minus water), as applied, in RIM 42, RIM 43, and RIM 44. The records show the facility was in compliance with this limit.

The combined VOC emissions from FG-RIMPROCESS including purge and cleanup solvent were 15.64 tpy, as of December 2013, and 13.3 TPY as of July 2014, which are in compliance with the VOC limit of 37.3 TPY based on a 12-month rolling time period as determined at the end of each calendar month.

VOC/Acetone emissions from EU-CLEANUP were 1.81 TPY as of December 2013 and 1.79 tpy as of July 2014, which are in compliance with the limit of 7.0 tpy based on 12-month rolling time period as determined at the end of each calendar month.

Process and Operational Restrictions:

The Two carbon systems for RIM42, RIM 43 and RIM44 are installed. The CA systems are equipped with pressure differential monitors. The RIM clamps are properly equipped with exhaust filters.

Testing, Monitoring & Recordkeeping:

Facility is keeping a current listing of chemicals used as required by the ROP. Facility is keeping records for the chemical identification, VOC content, usage, mixing ratio, VOC emissions calculations on a monthly basis, for the coating, cleanup and purge solvents. Facility has not analyzed the VOC content of the materials. The information is provided to the facility by the supplier.

The facility is calculating and keeping records of the DCPD containing materials processed in the RIMs, on an hourly basis, number of hours and dates when DCPD is used in FG-RIMPROCESS. The facility keeps the records of hours of DCPD usage as shifts per day.

Facility is keeping a current listing of each material used in the RIM process.

The facility is keeping all records of required data and completing all required calculations for the RIM process as required in the ROP.

Mr. Barick informed me that the facility is monitoring each carbon adsorption system as outlined in Appendix 5B. He told me that they did not experience any carbon breakthrough in either of their carbon systems during the last two years.

The facility is monitoring and keeping pressure drop data and other parameters for CA No. 2 system and for CA No. 3 system. The Carbon filters in both booths were replaced in January 27, 2014 and on August 6 and August 7 for CA No. 2 and CA No.3 respectively

The RIM Booth exhaust filters appears to be replaced as outlined in Appendix 3.2. The filters appeared to be in good condition and in place. The facility is keeping records of the condition of the RIM booth exhaust filters on a daily basis as outlined in Appendix 4.

Table F-1.4: FG-MACT: Facility's coating operations are subject to 40 CFR 63, Subpart P-1 National Emission Standards for Surface Coating for Plastic Parts and Products. This NESHAP was promulgated on April 19, 2004. The compliance date was April 19, 2007. The compliance period is 12 months from May 1, 2007 (since the promulgation date was not on the first of the month). The processes in FG-MACT are classified as existing sources.

EU-PLT2-RIM45 and FGSHUTTLECLAMP are new installations and are subject to requirements for New or Reconstructed-General Use Coating. The HAP emission limits for existing and new sources-General Use coating are the same (0.16 lb per lb of coating solids).

The facility provided emission calculations (lb HAP/lb coating solids) in the 2013 Annual Certification Report (January-December, 2013) and 2014 1st Semi-annual compliance report (January –June, 2014). The reports show that the each coating line is in compliance with the emission limit. The Plant 1 Booth has the highest emissions (0.13 lb HAP/lb Coating Solids).

EU-PLT2-RIM-45: Permit to Install No. 365-08A was issued on January 7, 2009. This emission unit is a 600 ton (11x14) Pacific Reaction Injection Molding (RIM) press which processes polyurethane-containing

materials. When polyurethane materials are processed, mold release agents are used and in-mold painting (IMP) may also be used. The equipment includes vent hood enclosure with two banks of particulate filters (in series) for exhaust gases. HVLP applicators are used for the application of the in-mold painting. Acetone is used for purge and cleanup activities. At the time of my inspection, RIM 45 was not in operation.

The PTI limits VOC and acetone emissions to 32.4 tpy calculated based on 12-month rolling time period as determined at the end of each calendar month. The submitted records show that VOC and acetone emissions are 9.97 tons as of December 2013 and 9.71 TPY as of July 2014.

The acetone emissions from purge and clean up process) are limited to 2.4 tpy calculated based on 12-month rolling time period as determined at the end of each calendar month. The submitted records show that acetone emissions from the purge and cleanup processes are 0.17 TPY as December 2013 and 0.17 TPY as of July 2014.

Hydrocarbon naphtha (CAS No. 64742-47-8) emissions are limited to 38.4 pounds per day calculated on a calendar day basis. Facility is not using Hydrocarbon Naphtha in their process.

The VOC content of the in-mold paint is limited to 5.1 pound/gallon (minus water), as applied, on an instantaneous basis. The records show that the VOC content of the coatings, as applied, is less than 5.1 lb/gallon (minus water).

Mr. Spurlin informed me that they are not using DCPD in the RIM 45 process. They are collecting the waste materials and spent filters and disposing these properly. I observed that VOC and HAP containing materials, including coatings, reducers, mold release agents, solvents and thinners are collected and stored in closed containers.

I observed that the exhaust filters in the RIM 45 is properly placed and not excessively dirty. Facility is using HVLP equivalent applicators for the coating. They are using manufacturers' data sheet and analysis for calculating VOC content of the coatings.

Facility is keeping a listing of the chemical composition of the chemicals used in RIM 45. Facility is keeping records of gallons of VOC containing materials, VOC content, and aggregate monthly and annual VOC emissions.

They are using acetone in the purge/cleanup in the process. The stack dimensions were not verified.

This process is subject to Miscellaneous Plastic Parts Coating MACT (40 CFR 63, Subpart PPPP). This emission unit is subject to emission standards for new sources.

FGSHUTTLECLAMP: Permit to Install No. 144-10 was approved on February 15, 2011. The operations started on October 13, 2011. This flexible group includes Reaction Injection Molding and In-Mold paint operations associated with the shuttle clamp process. The included emission units are EUMOLDRELEASE, EUCLAMPBOOTH1, EUCLAMPBOOTH2, EURESIN, EUPAINTKITCHEN, EUFINISHING, EUPARTSWIPE, and EULINECLEANING. The High Gloss In-Mold Paint Long Fiber Injection Process (HGIMP LFI process) is a reaction injection molding (RIM) process similar to other RIM processes at the facility; however, in this process long glass fibers are injected into the molds with resin in order to add strength to the plastic. This process makes coated plastic parts for agricultural or transportation equipment.

The PTI (Condition 1.1) limits the VOC emission rates to 40 TPY based on a 12-month rolling time period as determined at the end of each calendar month. The submitted records show that the VOC emissions were 11.51 TPY during 2013 and 11.10 TPY as of July 2014.

Condition II.1 limits the instantaneous VOC content of the coating, as applied, to 4.5 lb/gal (minus water). The records show that the Actual VOC less exempt solvents is 4.49 lb/gal. The electronic MSDS shows that the VOC content less exempt solvent was 5.05 lb/gal (less water and federally exempt solvents). The facility appears to be using the coating as received and it uses only one kind of coating. The use high VOC

content coating appears to be a violation of SC II.1. A Violation Notice will be sent to clarify the discrepancy.

Condition II.2 limits the VOC from Barrier Coat to 1,111 lb/day and VOC from LFI Resin to 2933 lb/day. The records show that the facility is in compliance with these limits.

Condition III.1- During inspection I observed that all bay doors were closed.

Condition III.2 & 5-The facility collects and stores all waste materials and wiping clothes in closed containers.

Condition III.3-Mr. Spurlin told me that they are disposing the spent exhaust filters properly.

Condition III.4-The paint booths are kept closed during operation minimizing the fugitive emissions. The coating drums and other solvent containers were kept closed.

Condition IV.1 & 2- Mr. Spurlin informed me that the booths are equipped with exhaust filters and facility is using automatic or equivalent HVLP applicators.

Condition V.1- Facility is using US EPA Method 24 data provided by the supplier.

Condition V.2- Facility performed USEPA Method 24 on the LFI resin and Barrier Coat separately. AQD received the test results on January 18, 2012.

Section VI-Monitoring/Recordkeeping

Condition VI.1- Facility performs all the required calculations in acceptable format and appears to complete the calculations within the specified time.

Condition VI.2- Facility is keeping a current listing from the manufacturer of the chemical composition of each material.

Condition VI.3 - Permit keeps records, on a monthly basis, of gallons of each material used, VOC content (minus water and with water), VOC mass emission calculations (monthly and annually).

Condition VI.4-Permittee keeps records of Barrier Coat and LFI Resin used on a monthly basis. Based on the submitted records, the facility does not appear to be keeping daily records of Barrier Coat and LFI Resin. This is a violation of the permit requirements. A Violation Notice would be sent to verify compliance.

Condition VIII.1 & 2 – The stack heights were not verified, but appear to be in compliance with the permit requirements.

Condition IX- This process is subject to Miscellaneous Plastic Parts Coating MACT (40 CFR 63, Subpart PPPP). This emission unit is subject to emission standards for new sources.

The electronic CD of the monitoring records and emissions calculations and hard copies of the 12-month reports are attached for review.

Conclusion:

1. Based on the provided MSDS, the facility appears to have exceeded the VOC content limit of the coating used in the Shuttle Clamp process during August 2012- July 2014.
2. Clamps LFI-4 and LFI 5 were missing exhaust filters installed behind the clamps.
3. Facility is keeping records of paint booths and RIMs filter changes separately. During ROP renewal Appendix 4 will be modified to include filter replacement dates.

4. The 5 coating samples collected are sent out for VOC content analysis. The results will be compared with the VOC content specified in the MSDS.

NAME S. Kallumbal

DATE 9/25/14

SUPERVISOR CTE