

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

B585450402

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: 08/21/2019
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Level 2 Target Inspection		
RESOLVED COMPLAINTS:		

On August 21, 2019, the Michigan Department of Environment, Great Lakes and Energy (EGLE) staff, Shamim Ahammod and I conducted an annual inspection at Romeo RIM, Inc. located at 74000 Van Dyke Avenue, Romeo, Michigan. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the EGLE-AQD (Air Quality Division) Administrative Rules; the facility's Renewable Operating Permit (ROP) No. MI-ROP-B5854-2015a; and Permit to Install (PTI) No. 147-18. This facility is subject to certain applicable provisions of AQD Administrative Rule R 336.1632 (Rule 632) and 40 CFR Part 63, Subparts A and PPPP for surface coating of plastic parts and products.

ROP No. MI-ROP-B5854-2015a contained the following emission units and flexible groups: EU-PLT2-LINE1, EU-PLT2-RIM45, FG-PLT1-RIM-IMP, FG-PLT1-SCL1256&SCL34, FG-RIMPROCESS, FG-SHUTTLECLAMP, FG-COLDCLEANERS, FG-RULE287(C) and FG-MACT-SUBPART_PPPP.

The facility's ROP No. MI-ROP-B5854-2015a is expiring on January 26, 2020 and Romeo Rim submitted the ROP renewal application (Application No. 201900115) on July 2, 2019 and obtained application shield on July 11, 2019. To help out AQD staff Sebastian Kallumkal, AQD staff Shamim Ahammod will work on the ROP renewal application and I am conducting the annual inspection this year.

Romeo Rim Inc. (RRI) manufactures plastic parts such as bumpers, dashboards, fenders, hoods, and engine covers for trucks, recreational vehicles, farm and lawn machineries and equipment such as John Deere products. The plastic parts are formed using either polyurethane or dicyclopentadiene (DCPD) as primary raw materials.

In this facility, production is conducted in 2 separate buildings, Plant 1 and Plant 2. In both plants, plastic parts are formed using reaction injection molding (RIM) equipment. The RIM processes conducted at this facility are all closed-mold processes wherein a resin and a catalyst are injected into the mold and react to form a solid plastic part. Some molding processes use a mold release agent or an "in-mold painting" process prior to the RIM process. The facility RIM processes apply the mold release agent, or in-mold painting (IMP), or coats the molded part after the molding process in a separate spraybooth. For mold release agent and IMP, the

coating is sprayed to the interior of the mold prior to the RIM process. The coating is transferred to the surface of the part to get the desired color. When DCPD is used, no mold release agent or IMP is used. When polyurethane is processed, mold release agent or IMP may be used.

During inspection, I observed, 7 operating IMP molding processes (EU-PLT1-IMP2, EU-PLT1-IMP12, EU-PLT1-IMP24, EU-PLT1-IMP26, EU-PLT1-IMP28, EU-PLT1-IMP29, EU-PLT1-IMP50) and 2 post-mold coating lines (EU-PLT1-LINE1 and EU-PLT1-LINE2), in Plant 1. I observed 4 operating IMP molding processes (EU-PLT2-RIM42, EU-PLT2-RIM43, EU-PLT2-RIM44, and EU-PLT2-RIM45) and one post-mold coating line, EU-PLT2-LINE1, in Plant 2. In this facility, the RIM process is also called a "CLAMP" process. The exhaust emissions from the Plant 2 RIM processes are controlled by dry filters and additional two Carbon Adsorption units: one unit for both EU-PLT2-RIM42 and EU-PLT2-RIM43 and another unit for EU-PLT2-RIM44.

EU-PLT2-RIM45 only has dry filter control system. In addition, there's a paint storage and mixing room associated with EU-PLT2-RIM42 process. Each post-mold coating line in Plant 1 consists of a manual spray paint booth, a shared flash off area and natural gas curing oven. The post-mold coating line in Plant 2 consists of a spray booth, a flash off area, and curing oven. In addition, I observed a post-mold paint storage in Plant 2.

The table below shows a summary of all the emission units (EU) we looked at during walk-through inspection. We started at Plant 1 and then proceeded to Plant 2 located at the rear section of the facility complex. I took notes on whether the EU was operating; observed filter conditions and placement; types of painting equipment used; and operating parameters as required by the applicable requirements in the ROP's various emission units and flexible groups as discussed below:

Table Summary of Emission Units Inspection Results:

Emission Unit	Emission Unit Description	Filter Conditions	Comments
EU-PLT2-LINE1	Plant 2, Paint Line 1	Filter in place, no gaps	Operating; HVLP
EU-PLT2-RIM45	Plant 2- RIM 45 (11x14)	Filter in place, no gaps	Operating; HVLP
EU-PLT1-IMP2	Plant 1 - Clamp No.2 (Cinci-1)	Filter in place, no gaps	Operating but not painting
EU-PLT1-IMP5 (uninstalled)	NA	NA	NA
EU-PLT1-IMP12	Plant 1 - Clamp No. 12 (LFI-3)	Filter in place, no gaps	Operating; HVLP
EU-PLT1-IMP24	Plant 1 - Clamp No. 24 (LFI-5)	Filter in place	Not Operating
EU-PLT1-IMP26	Plant 1 - Clamp No. 26 (LFI-1)	Filter in place, no gaps	Operating; HVLP
EU-PLT1-IMP28	Plant 1 - Clamp No. 28 (LFI-2)	Filter in place, no gaps	Operating; HVLP
EU-PLT1-IMP29	Plant 1 - Clamp No. 29 (LFI-4)	Filter in place	Not Operating; HVLP
EU-PLT1-IMP50		Filter in place, no gaps	Operating, but not painting

	Plant 1 - Clamp No. 50 (Cinci-2)		
EU-PLT1-LINE1	Plant 1, Paint Line 1- Includes spray booth #1	Filter in place, no gaps Stage 1 replaced daily	Operating
EU-PLT1-LINE2	Plant 1, Paint Line 2- Includes spray booth #2	Filter in place, no gaps Stage 1 replaced daily	Operating
EU-PLT2-RIM42	Plant 2-RIM 42 (5x7)	Filter in place, no gaps VOC Monitor = 9.5 ppm Pressure Diff = 0.8" WC	Operating Using DCPD. Carbon adsorber running
EU-PLT2-RIM43	Plant 2- RIM 43 (11x6)	Filter in place, no gaps (VOC monitoring data same as above)	Operating. Using DCPD. Sharing Carbon adsorber with RIM42
EU-PLT2-RIM44	Plant 2- RIM 44 (10x12)	Filter in place	Operating; run in AM; 2 nd floor VOC Monitor and pressure drop gauge
EUCLAMPBOOTH1	Paint/catalyst mixture and barrier coat will be applied to a mold inside this booth. .	Filters in place.	Operating; robotic applicator
EUCLAMPBOOTH2	Paint/catalyst mixture and barrier coat will be applied to a mold inside this booth. .	Filter in place	Operating; robotic applicator
EUSPACOATING	Manually applied (sprayed) coating to spas (molded parts).	Stain applied manually (wiping)	Operational but not operating
EUROTARYPAINT	Mold release is applied to the mold. High efficiency dry fabric filters will be used to control particulate from overspray.	Filter in place	Operating; robotic applicator Diff. Pressure = 0.30" WC
EUROTARYBC	Barrier coat will be applied to a mold inside this booth.	Filter in place	Operating; robotic applicator Diff. Pressure = 0.16" WC
EUROTARYLF11	Two part polyurethane mixture with embedded glass fibers is injected into the mold (reaction injection molding).	NA	Not operating; robotic applicator
EUROTARYLF12	Two part polyurethane mixture with embedded glass fibers is injected into the mold (reaction injection molding).	Filter in place	Operating; robotic applicator Diff. Pressure = 0.26" WC
FGCOLDCLEANERS	Two cold cleaners/parts washers	NA	Cover closed; safety instructions posted

Renewable Operating Permit No. MI-ROP-B5854-2015a

The ROP contains the following emission units (EUs) and flexible groups (FGs): EU-PLT2-LINE1, EU-PLT2-RIM45, FG-PLT1-RIM-IMP, FG-PLT1-SCL1 & 2, FG-RIMPROCESS, FG-SHUTTLECLAMP, FGROTARY, FG-RULE287(c), FG-MACT-SUBPART_PPPP, and FG-COLDCLEANERS.

EU-PLT2-LINE1 - consisting of one paint spray booth, one flash-off area, one bake oven, and one parts-wipe process done prior to coating. This line applies paint to miscellaneous plastic parts and utilizes acetone for purge. It also has post-mold paint storage and mixing room. The facility keeps monthly records of type of the coatings, 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 monthly 12-month rolling total VOC emission rates for December 2018 and June 2019 were 0.23 tpy and 0.29 tpy respectively and below the 18.7 tpy permit limit. The average VOC emission rate in pounds per hour (pph) was at 0.26 pph and less than the 6.0 pph permit limit. The records showed that the highest VOC content of the coating used was 3.51 pounds (lb.) per gallon less water and as applied (T01610001XXA, primer) and in compliance with the 3.9 lb./gal. permit limit. The Acetone usage records showed that the average hourly acetone emission rates from the line purging process were 0.20 lb/hr and 0.17 lb./hr. for December 2018 and June 2019 respectively and less than the permit limit of 0.6 lb./hr. The monthly 12-month rolling total Acetone emission rate for December 2018 and June 2019 were 0.09 tpy and 0.14 tpy respectively and less than the 1.7 tpy permit limit. As listed in the table above, the EU had filters in place; used HVLP type spray guns as I observed 2 lines attached to the gun; and appeared to replace filters according to schedule in Appendix 3.1 of the ROP. I observed all drums of solvent, solvent waste, and wipe-rags waste covered. Per EU-PLT2-LINE1(V.1), Mr. Spurlin submitted a schedule list of coatings tested for VOC content using Method 24 and for testing to comply with the 5-year cycle.

EU-PLT2-RIM45 – refers to 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. This EU includes press 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. Per EU-PLT2-RIM45(I.1), the usage records showed the monthly 12-month rolling total VOC and Acetone combined emission rates at 3.21 tpy and 3.26 tpy for December 2018 and June 2019 respectively and less than 32.4 tpy permit limit. Per EU-PLT2-RIM45 (I.2), the monthly 12-month rolling total Acetone emission rates from purge and cleanup showed 0.19 tpy and 0.21 tpy for December 2018 and June 2019 respectively and less than 2.4 tpy permit limit. Per EU-PLT2-RIM45(II.1), records showed that the highest VOC content of in-mold coating (T115400002XCB, blue paint) used was 4.66 lb./gal., in June 2019, and less than the permit limit of 5.1

lb./gal., minus water and as applied on an instantaneous basis. Per EU-PLT2-RIM45(II.2), Mr. Spurlin mentioned that DCPD was not used in the RIM45 process. As listed in the table above and per EU-PLT2-RIM45(III, IV, V, & VI), the EU had filters in place; used HVLP type spray guns as I observed 2 lines attached to the gun; and appeared to replace filters according to schedule in Appendix 3.2 of the ROP. I observed all containers of solvent, solvent waste, and waste materials covered.

The waste materials and spent filters were collected and disposed properly. Per EU-PLT2-RIM45(V.2), Mr. Spurlin submitted a schedule list of coatings tested for VOC content using Method 24 and for testing to comply with the 5-year cycle. Facility kept a listing of the composition of the chemicals used in EU-PLT2-RIM45. Facility kept records of gallons of coatings, VOC content, and aggregate monthly and annual VOC emissions.

FG-PLT1-RIM-IMP - this flexible group covers RIM processes in Plant 1 with mold release and IMP (Clamp Nos. 2, 5, 12, 24, 26, 28, 29 and 50) with one paint and mold release mix room, a storage room, and natural gas fired oven rated at 1 MMBTU/hr. Clamp No. 5 (EU-PLT1-IMP5) has been dismantled.

On January 24, 2019, the facility obtained Permit to Install No. 147-18 to modify FG-PLT1-RIM-IMP and FG-MACT-SUBPART_PPPP. FG-MACT-SUBPART_PPPP was expanded to include additional Federal applicable requirements contained in the MACT standard, 40 CFR Part 63, Subparts A and PPPP. In FG-PLT1-RIM-IMP, EU-PLT1-IMP2 and EU-PLT1-IMP50 were removed. EU-PLT1-IMP51 and EU-PLT1-IMP52 were added. During walk-through inspection, I observed, EU-PLT1-IMP2 and EU-PLT1-IMP50 are still installed and operational but not coating at that time. EU-PLT1-IMP51 and EU-PLT1-IMP 52 are still uninstalled. Per Mr. Wade, EU-PLT1-IMP2 and EU-PLT1-IMP50 will be dismantled once EU-PLT1-IMP51 and EU-PLT1-IMP52 are installed and operating. Per FG-PLT1-RIM-IMP(I.1), records showed that the average hourly VOC emission rates based on monthly hours of operation were 4.25 lb./hr. and 6.92 lb./hr. for December 2018 and June 2019 respectively and less than the 42.25 lb./hr. permit limit. Per FG-PLT1-RIM-IMP(I.2), records showed that the monthly 12-month rolling total VOC emission rates were 11.83 tpy and 12.29 tpy for December 2018 and June 2019 respectively and less than the 69.06 tpy permit limit. Per FG-PLT1-RIM-IMP(II.1), the highest VOC content for coating used showed 4.49 lb./gal. and 4.25 lb./gal. for December 2018 and June 2019 respectively and less than the 5.75 lb./gal. allowable permit limit per the AQD Administrative Rule R 336.1632(20), Table 66. Per FG-PLT1-RIM-IMP(III, V, & VI), the applicable EUs had filters in place; used HVLP type spray guns; appeared to replace filters according to schedule in Appendix 3.2 of the ROP; and kept records as specified in Appendix 4 of the ROP. I observed all containers of solvent, solvent waste, and waste materials covered. The waste materials and spent filters were collected and disposed properly. Per Per FG-PLT1-RIM-IMP(V.1), Mr. Spurlin submitted a schedule list of coatings tested for VOC content using Method 24 and for testing to comply with the 5-year cycle. Facility kept a listing of the composition of the chemicals used in FG-PLT1-RIM-IMP. Facility kept records of gallons of coatings, VOC content, and aggregate monthly and annual VOC emissions.

FG-PLT1-SCL1 & 2 – two coating lines (Lines 1 and 2) in Plant 1 that conduct “Post-Applied Paint” plastic parts coating operations and consist of 1 bake curing oven with parts wiping prior to coating, post mold paint storage, and mixing rooms. These booths have two stage exhaust filters for particulate control.

Per FG-PLT1-SCL1&2(I.1), the usage records showed the monthly 12-month rolling total VOC and Acetone combined emission rates at 9.26 tpy and 8.97 tpy for December 2018 and June 2019 respectively and less than 31.7 tpy permit limit. Per FG-PLT1-SCL1&2(I.3), the monthly 12-month rolling total VOC and Acetone emission rates from purge and cleanup showed 0.43 tpy and 0.40 tpy for December 2018 and June 2019 respectively and less than 8.3 tpy permit limit. Per FG-PLT1-SCL1&2(I.2 & II.1), records showed that the VOC content of coating (T00910003XXA) used was 4.91 lb./gal., in June 2019, and less than the allowable permit limit of 5.45 lb./gal., minus water and as applied on an instantaneous basis and per AQD Administrative Rule R 336.1632(20), Table 66. As listed in the table above and per FG-PLT1-SCL1&2(III, IV, V, & VI), the 2 EUs had filters in place; used HVLP type spray guns; appeared to replace filters according to schedule in Appendix 3.1 of the ROP; and kept records as specified in Appendix 4 of the ROP. Per FG-PLT1-SCL1&2(V.1), Mr. Spurlin submitted a schedule list of coatings tested for VOC content using Method 24 and for testing to comply with the 5-year cycle. On a monthly basis, the facility kept records of gallons of coatings used, purge and clean-up solvents and Acetone, VOC content, aggregate monthly and annual VOC emissions based on 12-month rolling totals, and hours of operation. Per FG-PLT1-SCL1&2(IX.1, 2, & 3), I observed all containers of solvent, solvent waste, and waste materials covered. The waste materials and spent filters were collected and disposed properly.

FG-RIMPROCESS - 120 ton press, Clamp 11x6), EU-PLT2-RIM44 (300 ton press, Clamp 10x12), and EU-CLEANUP that is located in Plant 2 and which process dicyclopentadiene (DCPD) and polyurethane containing materials. When DCPD-containing materials are processed, only small amounts of mold release agents are used and no In-Mold-Paint (IMP) is used. When polyurethane-containing materials are processed, mold release agents are used and In-Mold Paints may also be used. When DCPD containing materials are processed, the VOC emissions are controlled by carbon adsorption system which has two banks of particulate filters (in series) followed by two carbon filter banks (in series). EU-PLT2-RIM42 and EU-PLT2-RIM43 use electronic applicators and EU-PLT2-RIM44 uses HVLP compliant applicators for the application of the In-Mold-Paints. Acetone and/or VOCs are used for purge and cleanup (EU-CLEANUP). No acetone/VOC purge and cleanup 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 walk-through inspection, EU-PLT2-RIM44 operated in the morning while the other 2 RIMs were operating and DCPD were used. VOC monitor and pressure drop data were recorded in the above table except for RIM44. Per FG-

RIMPROCESS(I.1), the usage records showed the monthly 12-month rolling total VOC emission rates for RIM42 at 2.14 tpy and 2.21 tpy for December 2018 and June 2019 respectively and less than 15.0 tpy permit limit. The monthly 12-month rolling total VOC emission rates for RIM43 at 0.60 tpy and 1.55 tpy for December 2018 and June 2019 respectively and less than 15.0 tpy permit limit. The monthly 12-month rolling total VOC emission rates for RIM44 at 2.17 tpy and 2.54 tpy for December 2018 and June 2019 respectively and less than 20.0 tpy permit limit. The monthly 12-month rolling total VOC emission rates for FG-RIMPROCESS including purge and cleanup at 8.48 tpy and 9.87 tpy for December 2018 and June 2019 respectively and less than 15.0 tpy permit limit. Per FG-RIMPROCESS(I.2), the monthly 12-month rolling total VOC and Acetone emission rates from EU-CLEANUP showed 0.46 tpy and 0.65 tpy for December 2018 and June 2019 respectively and less than 7.0 tpy permit limit. Per FG-RIMPROCESS(II.1 & 2), records showed that the VOC content of IMP material (T01960001XGR, Polane S) used was 4.29 lb./gal., in both December 2018 and June 2019, and less than the allowable permit limit of 4.8 lb./gal., minus water and as applied on an instantaneous basis and per AQD Administrative Rule R 336.1632(20), Table 66. The submitted records showed the combined DCPD containing material emission rates at 61.95 lb./hr. and 73.76 lb./hr. for December 2018 and June 2019 respectively and less than the 1770 lb./hr. permit limit. As listed in the table above and per FG-RIMPROCESS(I.1), (III, V, & VI), the 3 EUs had filters in place; used HVLP type electronic/spray guns; appeared to replace filters according to schedule in Appendix 3.2 of the ROP; and kept records as specified in Appendix 4 of the ROP. During walk-through inspection, I observed the carbon adsorption system operating while DCPD containing materials were used in RIM42 and RIM43 and took pressure drop reading. Per FG-RIMPROCESS(V.1), Mr. Spurlin submitted a schedule list of coatings tested for VOC content using Method 24 and for testing to comply with the 5-year cycle. On a monthly basis, the facility kept records of gallons of IMP coatings used, materials with DCPD used, mold release agent, purge and clean-up solvents and Acetone, VOC content, aggregate monthly and annual VOC emissions based on 12-month rolling totals, and hours of operation. Per FG-RIMPROCESS(IX.1 & 2), I observed all containers of solvent, solvent waste, and waste materials covered. The waste materials and spent filters were collected and disposed properly.

FG-SHUTTLECLAMP – refers to RIM and IMP coating operations associated with the shuttle clamp process in Plant 1. This flexible group includes the following emission units: EUMOLDRELEASE, EUCLAMPBOOTH1, EUCLAMPBOOTH2, EURESIN, EUPAINTKITCHEN, EUFINISHING, EUPARTSWIPE, and EULINECLEANING. I conducted walk-through inspection at the 2 shuttleclamp booths and observed robotic coating applicators. Mr. Spurlin mentioned that the 2 booths take alternate turns in coating. The High Gloss IMP Long Fiber Injection Process (HGIMP LFI process) is a RIM process that injects long glass fibers into the molds with resin in order to add strength to the plastic. This process makes coated plastic parts for agricultural or transportation equipment.

Per FG-SHUTTLECLAMP(I.1), the usage records showed the monthly 12-month rolling total VOC emission rates at 7.82 tpy and 8.08 tpy for December 2018 and

June 2019 respectively and less than 40.0 tpy permit limit. Per FG-SHUTTLECAMP (II.1), records showed that the highest VOC content of IMP material (T16510001XGR, Jacuzzi Grey water based) used was 4.26 lb./gal., in both December 2018 and June 2019, and less than the allowable permit limit of 4.5 lb./gal., minus water and as applied on an instantaneous basis and per AQD Administrative Rule R 336.1632(20), Table 66. Per FG-SHUTTLECAMP(II.2), the highest VOC emission rates of Barrier Coat used were 250 lb./day and 203 lb./day for December 2018 and June 2019 respectively, and less than the allowable permit limit of 1,111.0lb./day. Per FG-SHUTTLECAMP(II.3), the highest VOC emission rates of LFI Resin used were 656 lb./day and 538 lb./day for December 2018 and June 2019 respectively, and less than the allowable permit limit of 2,933.0 lb./day. Per FG-SHUTTLECAMP(III), I observed the bay doors closed. I observed all containers of solvent, solvent waste, wipes, and waste materials covered. The waste materials and spent filters were collected and disposed properly. Per FG-SHUTTLECAMP(V.3), Mr. Spurlin submitted a schedule list of coatings tested for VOC content using Method 24 and for testing to comply with the 5-year cycle. Per FG-SHUTTLECAMP(VI), the facility kept monthly records of gallons of coatings, catalyst, mold release agent, line cleaning solvent, and parts wiping used and reclaimed, VOC content, aggregate monthly and annual VOC emissions based on 12-month rolling totals, and hours of operation. Facility replaced filters according to schedule in Appendix 3.2 of the ROP; and kept records as specified in Appendix 4 of the ROP.

FGROTARY – refers to rotary carrier IMP long fiber technology RIM process in Plant 1 that includes: EUROTPAINTKITCHEN, EUROTFINISHING, EUROTARTSWIPE, EUROTLINECLEANING, EUROTARYPAINT, EUROTARYBC, EUROTARYLFI1, and EUROTARYLFI2. Particulate emissions from EUROTARYPAINT are controlled by high efficiency dry fabric filters.

Per FGROTARY(I.1), the usage records showed the monthly 12-month rolling total VOC emission rates from FGROTARY at 6.4 tpy and 6.1 tpy for December 2018 and June 2019 respectively and less than 80.0 tpy permit limit. Per FGROTARY(I.2), the highest VOC emission rates of 2,4-Pentanedione from EUROTARYPAINT were 3.3 lb./day and 3.7 lb./day for December 2018 and June 2019 respectively, and less than the allowable permit limit of 42.3 lb./day. Per FGROTARY(II.1), the coating mixture VOC content associated with FGROTARY (T02110001AXX, Rimbond 740 Black Polyurethane) used was 4.2 lb./gal., in both December 2018 and June 2019, and in compliance with the allowable permit limit of 4.2 lb./gal. Per FGROTARY(III), I observed all containers of coatings, catalysts, cleanup solvents, purge solvents, wipes, and waste materials covered. The waste materials and spent filters were collected and disposed properly. Per FGROTARY(VI), the facility kept daily records of 2,4-Pentanedione usage in EUROTARYPAINT, and FGROTARY monthly records of gallons of coatings, catalyst, mold release agent, line cleaning solvent, and parts wiping used and reclaimed, VOC content, aggregate monthly and annual VOC emissions based on 12-month rolling totals, and hours of operation.

FG-RULE287(c) – flexible group refers to any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c). Currently, this ROP lists EUSPACOATING and EUSUNSHADES as emission units covered by this flexible group. During walk-through inspection, I observed that EUSUNSHADES was inoperational but still installed while EUSPACOATING was operational but not operating at that time. Submitted records showed that, CY 2018, the total coatings usage were 84.86 gallons and less than the 200 gallons/month limit.

FG-MACT-SUBPART-PPPP –refers to the facility's coating operations that are subject to 40 CFR Part 63, Subpart PPPP - National Emission Standards for Surface Coating for Plastic Parts and Products. This MACT standard 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). FG-MACT-SUBPART-PPPP includes requirements for both new and existing sources and was revised in PTI No. 147-18. The Organic HAP emission limits for existing and new sources of General Use coatings are the same at 0.16 lb. HAP/lb. of coating solids based on a 12-month rolling time period as determined at the end of each calendar month). Per FG-MACT-SUBPART-PPPP(I.1 & 2), the facility showed the monthly 12-month rolling total Organic HAP emission rates at 0.03 lb. HAP/lb. coating solids for December 2018 and June 2019 and less than the 0.16 lb. HAP/lb. coating solids permit limit. Per FG-MACT-SUBPART-PPPP(I.5), the facility used the "compliant material option" to determine compliance with the emission limit. Per FG-MACT-SUBPART-PPPP(II.1 & 2), Mr. Spurlin mentioned that the facility used Acetone (no Organic HAP) for thinners, additive, and cleaning material.

FG-COLDCLEANERS - this flexible group pertains to any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979. This ROP includes two cold cleaners: EU-PLT1PAINTWASH located in Plant 1 and EU-PLT2MAINTWASH located in Plant 2. Both cold cleaners use acetone as the cleaning solution. The spent solvent is hauled off site as manifested waste. During walk-through inspection, I observed the cold cleaners with lids closed and safety instructions posted.

Overall, I did not observe any noncompliance issues during walk-through inspection.

NAME



DATE

9/23/2019

SUPERVISOR



