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

B645553066

FACILITY: CURTIS METAL FINISHING CO		**SRN / ID:** B6455
LOCATION: 6645 SIMS DRIVE, STERLING HTS		**DISTRICT:** Warren
CITY: STERLING HTS		**COUNTY:** MACOMB
CONTACT: Ajay Jain , Environmental Manager		**ACTIVITY DATE:** 02/05/2020
STAFF: Adam Bognar	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On Wednesday, February 5, 2020, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) employee Adam Bognar conducted a scheduled inspection of Curtis Metal Finishing (the "Facility" or "CMF") located at 6645 Sims Drive, Sterling Heights, MI 48313. The purpose of this inspection was to determine the facility's compliance status with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) rules; and Permit to Install No. 383-00H.

I arrived at the facility at around 2 pm. I met with Mr. Ajay Jain, Environmental Manager. I identified myself, provided credentials, and stated the purpose of the inspection. Mr. Jain and I sat down in a conference room and held a pre-inspection meeting. During this meeting we discussed facility operations and reviewed records. After the pre-inspection meeting, Mr. Jain accompanied me for a facility inspection.

Curtis Metal Finishing performs coating operations on metal fasteners (nuts, bolts, screws) and other small metal parts. These parts are primarily for tier 1 automotive suppliers, making CMF a tier 2 automotive supplier. CMF also supplies industries such as military, aerospace, agricultural, and energy. There are 194 total employees that operate the plant 24 hours a day, 5 days per week. CMF operates weekends depending on demand.

CMF operates 11 dip-spin coating lines, 1 e-coat (electrodeposition) coating line, and three phosphate coating lines. CMF is a synthetic minor source for HAP and VOC. HAP emissions are limited to 9 tons per year for individual HAPs and 22.4 tons per year for aggregate HAPs.

Generally, when parts arrive, they are first sent through one of the three phosphate lines (lines 11, 12, and 14). Each of these lines is made up of a series of tanks including rinse tanks, sulfuric acid pickling tanks, zinc phosphate tanks, an oil tank, a sealer tank, and a dry off oven. Parts are dipped into the zinc-phosphate solution and then rinsed in consecutive distilled water and city water tanks. These phosphate lines appear to be exempt from Rule 201 requirements pursuant to Rule 290. CMF maintains records that demonstrate the Rule 290 exempt status (see attached).

After the phosphate lines, the parts are generally sent to either the e-coat line or one of the dip-spin lines.

The facility operates 11 dip-spin coating lines. All lines operate in a similar manner. In dip-spin coating, parts are coated by automatically loading them into a wire mesh basket and dipping the basket into a vat filled with coating. While still in the vat, the basket is lifted out of the liquid and spun on its vertical axis. This spinning action causes excess coating on parts to flow off the part and back into the coating vat. After the excess coating is removed the parts are dropped to a conveyor and sent to a flash-off zone and then to a curing oven.

Excess coating on the baskets is cleaned by blasting them on a table blaster using a metallic grit. The baskets go through a batch oven before blasting. The oven only serves to loosen coating, not to burn off excess coatings.
Emissions from the dip spin lines are controlled by three regenerative thermal oxidizers. RTO No. 1 controls line 21, 22, 23, 24, 25, 26, and 28. RTO No. 2 controls Line 27 and Line 29. RTO No. 3 controls Line 18 and Line 19. Dip spin line 20 is not controlled by an RTO and runs only EGLE AQD Rule 621 compliant coatings.

The facility previously operated two e-coat lines, line 41 and 42. E-coat line 41 has been shutdown since July 1, 2008 and has since been removed. E-coat coatings are applied by immersing the parts in a tank containing a coating solution. The e-coat line is anodic. A rectifier current is applied to the e-coat tank causing negatively charged coating to adhere to the positively charged metallic workpiece. After electrodeposition, the parts are rinsed in five-stage, countercurrent, permeate rinse tanks.

The rinse water from the electrodeposition process is treated in the on-site wastewater treatment facility. The wastewater treatment facility operates a clarifier to separate and removed the solids. A polymer is added to help precipitate the solids. The sludge is processed through a filter press.
Treated water is discharged to the Detroit Water and Sewerage System. The water treatment system appears to be exempt from Rule 201 requirements pursuant to Rule 285 (2)(m).

PTI No. 383-00H

EUDIPSPIN
EUDIPSPIN consists of seven miscellaneous metal parts dip-spin coating lines (Lines 21-26, and 28) and seven associated cure ovens controlled by a common regenerative thermal oxidizer (RTO1).

Section I – SC 1: VOC Emissions are limited to 51.5 tons per year based on 13-four week rolling time periods. I reviewed VOC emission records from 2018 through the end of 2019. CMF is in compliance with this emission limit based on the records I reviewed. VOC emissions were reported at 17.57 tons for the 13-four week rolling time period ending in December 2019.

Section I – SC 2: Limits the emission of Dibasic ester (CAS No. 627-93-0) to 3.7 tons per year based on 13 four-week rolling time periods. I reviewed VOC emission records from 2018 through the end of 2019. CMF is in compliance with this emission limit based on the records I reviewed. Dibasic ester emissions were reported at 0.34 tons for the 13-four week rolling time period ending in December 2019.

Section III – SC 1: States that the facility shall dispose waste coating, reducers, additives, and solvents in a manner that minimizes the introduction of air contaminants to the outer air. I observed that coatings were stored in sealed containers. Any waste generated is disposed of in closed 55-gallon drums and taken away by EQ Detroit, Inc. CMF does not take into account any reclaimed or disposed material in their emission calculations.

Section III – SC 2: Requires CMF to implement and maintain a malfunction abatement plan (MAP) for EUDIPSPIN. CMF maintains a MAP for these emission units. This MAP was submitted to the AQD on February 13, 2013 and found to be acceptable.

Section IV – SC 1: States that CMF shall not operate EUDIPSPIN unless the regenerative thermal oxidizer (RTO) is installed and operating properly. Proper operation includes maintaining a minimum temperature of 1400°F and a minimum VOC control efficiency of 83.6%. The RTO was operating during my inspection. According to the digital readout and the continuous monitor, RTO temperature was 1520°F.

A stack test was performed on RTO1 in March 2002. In this test, capture efficiency was determined to be 94.4% and destruction efficiency was determined to be 98.8%. This equates to a control efficiency of 93.4%. There is no requirement in the PTI for CMF to re-test this RTO periodically.

Section V – SC 1: Requires the permittee to determine VOC content and density of any coating as applied and as received using federal Reference Test Method 24. Mr. Jain stated that the VOC content of coatings is determined by information provided by coating suppliers. With prior approval, this condition allows CMF to use manufacturers VOC data in lieu of doing a Method 24 analysis on every coating. AQD granted CMF this approval under the condition that the facility perform one Method 24 analysis on a currently used coating each year, utilizing a different coating each year. An approval letter to use manufacturers VOC data was sent to CMF after this inspection on February 25, 2020.

Section VI – SC 1: Specifies monitoring and recordkeeping requirements for EUDIPSPIN. CMF must keep records of the RTO combustion chamber temperature, the chemical composition of all coatings/solvents used, the hours of operation of each coating line, and the volume of each coating used. This information shall be used to calculate the VOC and Dibasic ester emissions on a four-week and a 13-four-week rolling time period.

These records are maintained. CMF maintains multiple electronic databases that store and keep track of this information. I reviewed these databases during my inspection. Mr. Jain sent me digital versions of these spreadsheets (see attached). I reviewed these digital spreadsheets in my office. More records/info about this emission unit and other emission units can be found in the digital versions of these spreadsheets. These spreadsheets can be accessed on the AQD shared drive at the following address:
S:\Air Quality Division\STAFF\Bognar, Adam\Inspection Documents\Curtis Metal Finishing Company

I did not review records of RTO temperatures earlier than January 2020 during my inspection because older

records had just been moved to storage. I asked Mr. Jain to send me records of RTO temperatures for June 2019. Mr. Jain sent me these records on February 7, 2019 (see attached).

Section VIII – SC 1: Specifies stack parameters. The stacks at CMF appeared to be discharged unobstructed vertically upwards. I did not verify stack parameters during this inspection.

EUECOAT
EUECOAT is an electrodeposition coating line (Line No. 42) used to coat miscellaneous metal parts. This line consists of an electrodeposition tank, a five-stage water rinsing process, and a cure oven.

Section I – SC 1,2: VOC emissions from EUECOAT are limited to 800lb/four-weeks and 4.7 tons per year. I reviewed VOC emission records from 2018 through the end of 2019. CMF is in compliance with this emission limit based on the records I reviewed. VOC emissions were reported at 0.85 tons for the 13-four week rolling time period ending in December 2019. The highest reported 4-week period VOC emissions were 226 lbs in the 8th period of 2018.

Section V – SC 1,2,3: Specifies monitoring and recordkeeping requirements for EUECOAT. CMF must maintain records of the chemical composition of each coating/solvent used and the amount of each coating/solvent used. These records must be used to calculate VOC emissions on both a four-week and 13-four-week rolling time period.

These records are maintained. CMF maintains multiple electronic databases that store and keep track of this information. I reviewed these databases during my inspection. Coating usage information is maintained on log sheets near each dip spin machine by the operator. Mr. Jain sent me digital versions of the emission calculation spreadsheets (see attached). I reviewed these digital spreadsheets in my office.

Section VIII – SC 1: Specifies stack parameters. The stacks at CMF appeared to be discharged unobstructed vertically upwards. I did not verify stack parameters during this inspection.

EUDIPSPIN20
EUDIPSPIN20 is a dip spin line for coating miscellaneous metal parts. This dip spin line is not controlled by an RTO.

Section I – SC 1,2: VOC emissions from EUDIPSPIN20 are limited to 2000 lb/month and 10 tons per year. I reviewed VOC emission records from 2018 through the end of 2019. CMF is in compliance with this emission limit based on the records I reviewed. VOC emissions were reported at 8.82 tons for all of 2019. The highest annual emission was in December 2018 at 9.41 tons. The highest reported monthly emission rate was 1992.5 lbs in March 2018.

Section III – SC 1: States that the facility shall dispose waste coating, reducers, additives, and solvents in a manner that minimizes the introduction of air contaminants to the outer air. I observed that coatings were stored in sealed containers. This waste is disposed of in closed 55-gallon drums and taken away by EQ Detroit, Inc. CMF does not take into account any reclaimed or disposed material in their emission calculations.

Section III – SC 2: Requires CMF to handle all VOC/HAP containing materials in a manner to reduce fugitive emissions. I observed that VOC/HAP containing materials were stored in an organized manner in containers equipped with tight fitting lids.

Section V – SC 1: Requires the permittee to determine VOC content and density of any coating as applied and as received using federal Reference Test Method 24. Mr. Jain stated that the VOC content of coatings is determined by information provided by coating suppliers. With prior approval, this condition allows CMF to use manufacturers VOC data in lieu of doing a Method 24 analysis on every coating. AQD granted CMF this approval under the condition that the facility perform one Method 24 analysis on a currently used coating each year, utilizing a different coating each year. An approval letter to use manufacturers VOC data was sent to CMF after this inspection on February 25, 2020.

Section VI – SC 1,2,3: Specifies monitoring and recordkeeping requirements for EUDIPSPIN20. CMF must maintain records of the chemical composition of each coating/solvent used and the amount of each coating/solvent used. These records must be used to calculate VOC emissions on both a monthly and 12-month rolling time period.
These records are maintained. CMF maintains multiple electronic databases that store and keep track of this

information. I reviewed these databases during my inspection. Mr. Jain sent me digital versions of these spreadsheets (see attached). I reviewed these digital spreadsheets in my office.

Section VIII – SC 1,2,3: Specifies stack parameters. The stacks at CMF appeared to be discharged unobstructed vertically upwards. I did not verify stack parameters during this inspection.

FGDIPSPINS
FGDIPSPINS consists of two miscellaneous metal parts dip-spin coating lines (Line 27 & Line 29) controlled by a shared regenerative thermal oxidizer (RTO2).

Section I – SC 1: VOC emissions from FGDIPSPINS are limited to 18 tons per year. I reviewed VOC emission records from 2018 through the end of 2019. CMF is in compliance with this emission limit based on the records I reviewed. VOC emissions were reported at 11.60 tons for all of 2019. The highest annual emission was for the 12-month rolling period ending in September 2018 at 14.3 tons.

Section III – SC 1: States that the facility shall dispose waste coating, reducers, additives, and solvents in a manner that minimizes the introduction of air contaminants to the outer air. I observed that coatings were stored in sealed containers. This waste is disposed of in closed 55-gallon drums and taken away by EQ Detroit, Inc. CMF does not consider any reclaimed or disposed material in their emission calculations.

Section III – SC 2: Requires CMF to handle all VOC/HAP containing materials in a manner to reduce fugitive emissions. I observed that VOC/HAP containing materials were stored in an organized manner in containers equipped with tight fitting lids.

Section IV – SC 1: States that CMF shall not operate FGDIPSPINS unless the regenerative thermal oxidizer (RTO) is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining a minimum temperature of 1400°F and a minimum VOC control efficiency of 81%. The RTO was operating during my inspection. According to the digital readout and the continuous monitor, RTO temperature was 1600°F.
VOC control efficiency of this RTO was tested in 2014. The destruction efficiency was 98% and the capture efficiency was greater than 100%. It was not possible to calculate a valid capture efficiency value from the test data (data showed over 100%, which is impossible). Based on the results of this test, the VOC control efficiency is greater than 81%. AQD accepted the results of this stack test.

Section IV – SC 2: Requires CMF to install, calibrate, maintain, and operate a temperature monitoring device in the combustion chamber of the RTO and record the temperature on a continuous basis. This RTO is equipped with a combustion chamber thermocouple. This thermocouple is calibrated by the manufacturer. CMF does not do any calibration on their own. Instead, the thermocouples are replaced every year during the annual PM inspection.

Section V – SC 1: Requires the permittee to determine VOC content and density of any coating as applied and as received using federal Reference Test Method 24. Mr. Jain stated that the VOC content of coatings is determined by information provided by coating suppliers. With prior approval, this condition allows CMF to use manufacturers VOC data in lieu of doing a Method 24 analysis on every coating. AQD granted CMF this approval under the condition that the facility perform one Method 24 analysis on a currently used coating each year, utilizing a different coating each year. An approval letter to use manufacturers VOC data was sent to CMF after this inspection on February 25, 2020.

Section VI – SC 1,2,3,4: Specifies monitoring and recordkeeping requirements for FGDIPSPINS. CMF must maintain records of the chemical composition of each coating/solvent used, the amount of each coating/solvent used, and records of the RTO combustion chamber temperature on a continuous basis. These records must be used to calculate VOC emissions on both a monthly and 12-month rolling time period.

These records are maintained. CMF maintains multiple electronic databases that store and keep track of this information. I reviewed these databases during my inspection. Mr. Jain sent me digital versions of these spreadsheets (see attached). I reviewed these digital spreadsheets in my office. RTO combustion chamber temperature records are kept on a continuous basis on a chart recorder. Additionally, an operator manually records the RTO temperature on the digital readout once per shift.
I did not review records of RTO temperatures earlier than January 2020 during my inspection because older records had just been moved to storage. I asked Mr. Jain to send me records of RTO temperatures for June 2019. Mr. Jain sent me these records on February 7, 2019 (see attached).
Section VIII – SC 1: Specifies stack parameters. The stacks at CMF appeared to be discharged unobstructed

vertically upwards. I did not verify stack parameters during this inspection.

FGDIPSPINS2
FGDIPSPINS2 consists of two dip-spin lines (Line 18 & Line 19) for coating miscellaneous metal parts. Emissions from these two lines are controlled by a shared regenerative thermal oxidizer (RTO3).

Section I – SC 1,2: Establishes emission limits for FGDIPSPINS2. VOC emissions are limited to 18 tons per year and naphthalene emissions are limited to 742.5 lb/year. CMF is in compliance with these emission limits based on the records I reviewed. VOC emissions were reported at 1.94 tons for all of 2019. The highest annual emission was for the 12-month rolling period ending in April 2019 at 4.25 tons. Naphthalene emissions were reported at 79 lbs for all of 2019.

Section III – SC 1: States that the facility shall dispose waste coating, reducers, additives, and solvents in a manner that minimizes the introduction of air contaminants to the outer air. I observed that coatings were stored in sealed containers. This waste is disposed of in closed 55-gallon drums and taken away by EQ Detroit, Inc. CMF does not take into account any reclaimed or disposed material in their emission calculations.

Section III – SC 2: Requires CMF to handle all VOC/HAP containing materials in a manner to reduce fugitive emissions. I observed that VOC/HAP containing materials were stored in an organized manner in containers equipped with tight fitting lids.

Section III – SC 3: States that CMF shall not operate FGDIPSPINS2 unless a malfunction abatement plan (MAP) is implemented and maintained. The MAP for FGDIPSPINS2 was submitted to the AQD on March 23, 2018. I reviewed this MAP on February 13, 2020 and found it to be acceptable. See AQD shared drive for a copy of the MAP (S:\Air Quality Division\STAFF\Bognar, Adam\Inspection Documents\Curtis Metal Finishing Company).

Section IV – SC 1: States that CMF shall not operate FGDIPSPINS2 unless RTO3 is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the RTO combustion chamber temperature above 1400°F and maintaining a minimum destruction efficiency of 95% and a minimum capture efficiency of 85%. The RTO was operating during my inspection. According to the digital readout and the continuous monitor, RTO temperature was 1650°F.

CMF tested both the VOC capture efficiency and the VOC destruction efficiency of RTO 3 in October 2018. The results of this test showed a destruction efficiency of 99.4% and a capture efficiency of 59.9%. Since the capture efficiency was below 85%, a violation notice was issued to CMF for violating this condition. CMF responded to this violation in a timely manner.

Following the violation notice, CMF made some adjustments to try and improve the capture efficiency. CMF re-tested for capture efficiency in August 2019. The re-test indicated that the VOC capture efficiency is 88.4%. The results of these two tests indicate RTO3 has a control efficiency of 87.8%.

Section IV – SC 2: Requires CMF to install, calibrate, maintain, and operate a temperature monitoring device in the combustion chamber of the RTO and record the temperature on a continuous basis. This RTO is equipped with thermocouples at the RTO entrance, in the combustion chamber, and at the RTO exit. Combustion chamber temperature is used as the monitoring variable. These thermocouples are calibrated by the manufacturer. CMF does not do any calibration on their own. Instead, the thermocouples are replaced every year during the annual PM inspection.

Section V – SC 1: Requires the permittee to determine VOC content and density of any coating as applied and as received using federal Reference Test Method 24. Mr. Jain stated that the VOC content of coatings is determined by information provided by coating suppliers. With prior approval, this condition allows CMF to use manufacturers VOC data in lieu of doing a Method 24 analysis on every coating.

AQD granted CMF this approval under the condition that the facility perform one Method 24 analysis on a currently used coating each year, utilizing a different coating each year. An approval letter to use manufacturers VOC data was sent to CMF after this inspection on February 25, 2020.

Section V – SC 2,3: Requires CMF to verify, by testing, the capture efficiency and destruction efficiency of RTO3 within 180 days of commencing operation of FGDIPSPINS2. CMF has performed these tests. See discussion above.

Section VI – SC 1,2,3,4,5: Specifies monitoring and recordkeeping requirements for FGDIPSPINS2. CMF must maintain records of the chemical composition of each coating/solvent used, the amount of each coating/solvent used, and records of the RTO combustion chamber temperature on a continuous basis. These records must be used to calculate VOC emissions on both a monthly and 12-month rolling time period. Additionally, CMF must keep track of naphthalene usage on a monthly and annual basis.

These records are maintained. CMF maintains multiple electronic databases that store and keep track of this information. I reviewed these databases during my inspection. Mr. Jain sent me digital versions of these spreadsheets (see attached). I reviewed these digital spreadsheets in my office. RTO combustion chamber temperature records are kept on a continuous basis on a chart recorder. Additionally, an operator manually records the RTO temperature on the digital readout once per shift.
I did not review records of RTO temperatures earlier than January 2020 during my inspection because older records had just been moved to storage. I asked Mr. Jain to send me records of RTO temperatures for June 2019. Mr. Jain sent me these records on February 7, 2019 (see attached).
Section VII – Requires CMF to notify the AQD within 30 days after completing any installation, construction, reconstruction, relocation, or modification authorized by this permit to install. CMF submitted this notice to the AQD stating that the start of trial operation was April 16, 2018.

Section VIII – SC 1: Specifies stack parameters. The stacks at CMF appeared to be discharged unobstructed vertically upwards. I did not verify stack parameters during this inspection.

FGRULE621
FGRULE621 consists of all metal parts coating lines source-wide, including metal parts coating lines covered by other permits, which are exempted by Rule 336.1621(10)(b). EUDIPSPIN20 is currently the only emission unit operating in this flexible group.

Section I – SC 1: Establishes a 30 tons per year VOC emission rate for FGRULE621. All coating lines that operate as exempt from Rule 621 must have combined emissions less than 30 tons per year to remain exempt. CMF is in compliance with these emission limits based on the records I reviewed. VOC emissions were reported at 8.82 tons for all of 2019. The highest annual emission was for the 12-month rolling period ending in December 2018 at 9.41 tons.

Section III – SC 1: States that the facility shall dispose waste coating, reducers, additives, and solvents in a manner that minimizes the introduction of air contaminants to the outer air. I observed that coatings were stored in sealed containers. This waste is disposed of in closed 55-gallon drums and taken away by EQ Detroit, Inc. CMF does not consider any reclaimed or disposed material in their emission calculations.

Section III – SC 2: Requires CMF to handle all VOC/HAP containing materials in a manner to reduce fugitive emissions. I observed that VOC/HAP containing materials were stored in an organized manner in containers equipped with tight fitting lids.

Section V – SC 1: Requires the permittee to determine VOC content and density of any coating as applied and as received using federal Reference Test Method 24. Mr. Jain stated that the VOC content of coatings is determined by information provided by coating suppliers. With prior approval, this condition allows CMF to use manufacturers VOC data in lieu of doing a Method 24 analysis on every coating. AQD granted CMF this approval under the condition that the facility perform one Method 24 analysis on a currently used coating each year, utilizing a different coating each year. An approval letter to use manufacturers VOC data was sent to CMF after this inspection on February 25, 2020.

Section VI – SC 1,2,3: Specifies monitoring and recordkeeping requirements for FGRULE621. CMF must maintain records of the chemical composition of each coating/solvent used and the amount of each coating/solvent used. These records must be used to calculate VOC emissions on both a monthly and 12-month rolling time period.
These records are maintained. CMF maintains multiple electronic databases that store and keep track of this information. I reviewed these databases during my inspection. Mr. Jain sent me digital versions of these spreadsheets (see attached). I reviewed these digital spreadsheets in my office.

Section VIII – SC 1: Specifies stack parameters. The stacks at CMF appeared to be discharged unobstructed vertically upwards. I did not verify stack parameters during this inspection.

FGFACILITY

Section I – SC 1,2,3: Establishes facility-wide synthetic minor source emission limits. VOC emissions are limited to 89.9 tons per year. HAP emissions are limited to 9 tons per year for each individual HAP and 22.4 tons per year for total HAPs. CMF is in compliance with these emission limits based on the records I reviewed. VOC emissions were reported at 40.86 tons for all of 2019. The highest annual emission was for the 12-month rolling period ending in November 2018 at 45.31 tons.

Aggregate HAP emissions were reported at 2.64 tons for all of 2019. The highest reported yearly HAP emission rate occurred in October 2018 at 3.44 tons. The highest emitted individual HAP is Methanol. In 2019, Methanol emissions were reported at 1.57 tons.

Section V – SC 1: Requires CMF to determine the HAP content of any material as applied and as received using manufacturer's formulation data. CMF uses manufacturers formulation data when calculating the HAP emissions from coatings.

Section VI – SC 1,2,3: Specifies monitoring and recordkeeping requirements for FGFACILITY. CMF must maintain records of the amount of VOC and/or HAP containing material used or reclaimed at the facility. This information must be used to calculate the facility-wide VOC and HAP emissions on a monthly and 12-month rolling time period.

These records are maintained. CMF maintains multiple electronic databases that store and keep track of this information. I reviewed these databases during my inspection. Mr. Jain sent me digital versions of these spreadsheets (see attached). I reviewed these digital spreadsheets in my office.

Compliance Determination

Curtis Metal Finishing is operating in 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); Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) Administrative Rules; and Permit to Install Nos. 131-09C and 132-07.

NAME Adam Bognar DATE 9/25/2020 SUPERVISOR Sebastian Kallenkal