

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

N235257384

FACILITY: NCP Coatings, Inc.		SRN / ID: N2352
LOCATION: 225 Fort Street, NILES		DISTRICT: Kalamazoo
CITY: NILES		COUNTY: BERRIEN
CONTACT: Chris Thompson , EH&S Director		ACTIVITY DATE: 03/18/2021
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Announced / Scheduled Inspection due to COVID-19 Pandemic.		
RESOLVED COMPLAINTS:		

On March 18, 2021 AQD staff (Matt Deskins) went to conduct an announced/scheduled inspection of the Niles Chemical Paint Company (NCP) (SRN: N2352) located in Niles, Berrien County. The inspection had to be announced/scheduled due to the COVID-19 Pandemic. The facilities main business operation is the manufacturing of paints for the U.S. Navy and tree marking paints for the forest industry, although they make most if not all of the paints for the forest industry down at their facility down in Mishawaka, Indiana now. NCP has an opt-out permit (PTI 285-00A) that it operates under and has individual and facility wide emission limits for VOCs and HAPs. Staff had scheduled the inspection with Chris Thompson (EH&S Director) for approximately 10:30 a.m., so staff departed the district office at approximately 9:10 a.m.

Staff arrived at the main office of NCP at approximately 10:25 a.m. Prior to getting out of the vehicle, staff took a moment to see if any visible emissions could be observed from any of the buildings that make up the facility and none were noted. Staff then proceeded toward the office area where upon getting to the entrance door, Chris Thompson came to unlock it for staff. He let staff in and then led staff to another building where staff answered a COVID questionnaire as well as taking their temperature. Once the items were done and staff was deemed safe, Chris led staff to his office. Once in his office Chris gave staff a Visitors Safety Guide as well as a Visitor's Badge to wear while on site. Staff then sat down and asked Chris some questions about operations. The following is a summary of staff's discussions with Chris.

According to Chris, NCP currently employs approximately 83 people and they are currently working two shifts. The first shift is five days a week Monday through Friday from 5:00 a.m. until 1:00 p.m.

The 2<sup>nd</sup> Shift is a 10-hour shift Monday through Thursday from Noon until 10:00 p.m. Chris said that NCP's main business is still manufacturing of paints for the military and tree markings for the forest industry, but as mentioned earlier, the tree paints are mainly manufactured at their other facility. Staff asked what types of coatings they manufacture and Chris said it was mainly coatings for the Navy, various Industrial Sectors, and for Anti-Rust applications (both primers and topcoats). Staff then asked him how business has been and he said that is has been decent as of late and seems to be gradually picking up, but they did have a lull when the COVID pandemic first hit. Staff went on to ask if any equipment had been added or removed or if any processes had been changed since staff's last inspection back in 2017. Chris responded that there weren't any changes. He did say that they had moved the maintenance department out to a warehouse area so they could store all the totes indoors now. He said that they wanted a way to get them out of the weather. Staff then went through a summary of each of the facilities operations prior to taking a tour of the facility to make sure they were still up to date and accurate. The following are the Special Conditions of PTI No. 285-00A along with staff's comments of what was noted. The various process information of the various operations at the facility will preclude each applicable section of the PTI.

NOTE: In an effort to limit staff's time on-site, Chris e-mailed staff the records that they wanted to review.

### 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
EUPAINT	Paint manufacturing including mills, dispersers, portable and stationary mixing tanks, mixers, and container filling.	10/1/2001	FGFACILITY
EURESIN	Resin manufacturing including resin kettles, thin down tanks, filters, and storage tanks.	10/1/2001	FGFACILITY
EUTOTECLEAN	Tote cleaner.	10/1/2001	FGSUPPORT, FGFACILITY
EUTOTECLEAN2	Tote cleaner.	PTI DATE	FGSUPPORT, FGFACILITY
EUTOTEREFURB	Tote refurbishing activities, including tote painting.	10/1/2001	FGSUPPORT, FGFACILITY
EURECLAIM	Solvent reclamation unit.	10/1/2001	FGSUPPORT, FGFACILITY
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.			

**EUPAINT:** This emission unit consists of the main operations at NCP (Paint Manufacturing) and includes mills, dispersers, portable and stationary mixing tanks, mixers, and container filling. They manufacture paint and fill paint containers from the size of quarts all the way up to 300-gallon totes, but 1 and 5 gallon buckets are the majority. Staff noted during the facility tour that all the tanks, mills, and dispersers had covers on them as required. Staff also did not note any spills and it appears that good housekeeping is being done in this area with regards to this requirement. Staff noted that all rags and gloves that are used were being disposed of in marked metal bins that had mechanical lids. They have several large tanks that they store the military paint in when complete. They will then draw off these the amount that is needed to fill a specific order. Staff also observed several torit dust collectors around the mixing area of the building and that they were operating in areas that had operations going on. Staff did not observe any visible emissions from their operations and the stack heights appear to meet permit requirements.

The following conditions apply to: EUPAINT

**DESCRIPTION:** Paint manufacturing including mills, dispersers, portable and stationary mixing tanks, mixers, and container filling.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT:** Dust collector

## I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	18 tpy	12-month rolling time period as determined at the end of each calendar month	EUPAINT	SC II.1, SC III.1, SC VI.2	R 336.1205(3), R 336.1702(a)
2. Particulate	0.01 pounds per 1,000 pounds of exhaust gases	NA	EUPAINT	SC I.3, SC IV.1	R 336.1331

**AQD Comment to 1.1 and 1.2 Above:** Appears to be in COMPLIANCE. Records reviewed by staff show approximately 3.0 tons of VOC emissions for the 12-month rolling time period ending February of 2021. For particulate, staff did not note any visible emissions and the dust collectors were operating on respective equipment.

3. Visible emissions from EUPAINT shall not exceed a 6-minute average of 5 percent opacity. (R 336.1301)

**AQD Comment:** Appears to be in COMPLIANCE. Staff did not note any visible emissions during the inspection.

## II. MATERIAL LIMITS

1. The permittee shall not produce more than 2,000,000 gallons of coating in EUPAINT per 12 month rolling time period as determined at the end of each calendar month. (R 336.1205(3), R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE. Records reviewed by staff indicate that 563,388 gallons were manufactured for the 12-month rolling time period ending February 2021.

2. The triethylamine content of any coating shall not exceed 5 percent by volume. (R 336.1225, R 336.1901)

**AQD Comment:** Appears to be in COMPLIANCE. Staff has been told that this compound is in a pigment that they use and according to records this compound only amounts to about 1 to 3 pounds per month. Staff noted that in February 2021 they used 1.9 pounds of it.

### **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall equip all mixing tanks, mills, and dispersers with covers that reduce the air flow across the equipment and completely cover the equipment opening, except for openings which are no larger than necessary to allow safe clearance for the mixer shaft, etc. The openings shall be covered at all times except when operator access is necessary. In addition, all solvent containers shall be closed when not in use. (R 336.1205(3), R 336.1225, R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE. The facility appears to be doing these things.

2. The permittee shall immediately clean up all spills involving VOCs and volatile HAPs. Clean up shall be conducted in a manner that minimizes VOC and HAP emissions to the air. (R 336.1205(3), R 336.1225, R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE. This area appeared to have pretty good housekeeping being done with no issues noted.

3. The permittee shall keep all VOC and volatile HAP contaminated rags, gloves, sawdust, etc., in closed containers and shall dispose of these materials in a manner that minimizes VOC and HAP emissions to the air. (R 336.1205(3), R 336.1225, R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE. Everything gets disposed of in covered, labeled, metal bins.

### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not charge solids to any equipment normally controlled by a dust collector unless the dust collector is installed and operating properly in accordance with the operation and maintenance plan maintained on site. (R 336.1205(3), R 336.1301, R 336.1331)

**AQD Comment:** Appears to be in COMPLIANCE. Staff noted that the dust collectors (3 – Torits) were in operation, where equipment was running, and did not note any issues with visible emissions. The dust is collected in 55-gallon drums and some will be re-used later for filler in some coatings and what is not re-used shipped off as waste.

### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE.

2. The permittee shall keep the following information for EUPAINT:

a) Monthly and 12-month rolling time period amount, in gallons, of each product produced and the total for all products. (R 336.1205(3), R 336.1702(a))

b) Monthly and 12-month rolling time period number of batches produced and the size and cleaning frequency of the equipment. (R 336.1205(3), R 336.1702(a))

c) The formulation of each product produced including the VOC, Triethylamine, individual HAP, and total HAP contents. (R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)

d) Calculations of the monthly and 12-month rolling time period VOC emission rates using the production, cleaning, and formulation records. (R 336.1205(3), R 336.1702(a))

The permittee shall keep all records on file and make them available to the Department upon request.

AQD Comment to 2.a through 2.d Above: Appears to be in COMPLIANCE. Records were now being kept in a 12-month rolling format. Also, the facility has over 100,000 paint formulations and can pull any of them up as requested to show what is in them.

#### VIII. STACK/VENT RESTRICTIONS

1. The exhaust gases from the EUPAINT shall be discharged unobstructed vertically upwards to the ambient air from stacks with maximum diameters of 12 inches at exit points not less than 22 feet above ground level. (R 336.1225, R 336.1901, 40 CFR 52.21 (c) & (d))

AQD Comment: Appears to be in COMPLIANCE. The stacks appear to meet these requirements.

EURESIN: NCP purchases some of its resins and they are now outsourcing approximately 30% of it. Chris said that their Resin Operation is very outdated and their hope is to have all of it outsourced by the end of this year. NCP's Resin Operation / permit emission unit consists of resin kettles, thin down tanks, filters, and storage tanks. The resin kettle operation was not operating while staff was present but staff noted it was equipped with a scrubber as required. The scrubber also was equipped with a pressure drop indicator and had a flow meter installed as required. The thin down tank also was not operating while staff was present, but staff noted it was equipped with a condenser and exhaust gas temperature gauge as required. Since EURESIN was not in operation, staff did not observe any visible emissions. The stack heights appear to be in compliance.

#### The following conditions apply to: EURESIN

DESCRIPTION: Resin manufacturing including resin kettles, thin down tanks, filters, and storage tanks.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Wet scrubber, condenser.

#### I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	10 tpy	12-month rolling time period as determined at the end of each calendar month	EURESIN	SC II.1, SC III.1, SC III.2, SC VI.5	R 336.1205(3), R 336.1702(a)
2. Particulate	0.01 pounds per 1,000 pounds of exhaust gases	NA	EURESIN	SC I.3, SC I.4, SC II.1, SC VI.5	R 336.1331

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
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**AQD Comment to 1 and 2 Above:** Appears to be in COMPLIANCE. Records reviewed by staff ending in February 2021 indicate the VOC emissions at approximately 2.0 tons. Staff did not note any visible particulate emissions and the AQD has not requested any PM testing to date.

3. Visible emissions from EURESIN, except during addition of phthalic anhydride, shall not exceed a 6-minute average of 5 percent opacity. (R 336.1301)

**AQD Comment:** Appears to be in COMPLIANCE. The process was not operational during the inspection so VEs could not be observed.

4. Visible emissions from EURESIN, during addition of phthalic anhydride, shall not exceed a 6-minute average of 20 percent opacity except as allowed by Rule 301. (R 336.1301)

**AQD Comment:** Appears to be in COMPLIANCE. The process was not operational during the inspection so VEs could not be observed.

## II. MATERIAL LIMITS

1. The permittee shall not produce more than 651,000 gallons of resin in EURESIN per 12 month rolling time period as determined at the end of each calendar month. (R 336.1205(3), R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE. Records reviewed indicate 47,437 gallons produced for the most recent 12 month rolling total ending February 2021.

## III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate a resin kettle, except the research and development kettle, unless the scrubber is installed, maintained, and operating properly in accordance with the operation and maintenance plan maintained on site. (R 336.1205(3), R 336.1301, R 336.1331)

**AQD Comment:** Appears to be in COMPLIANCE. This was not in operation during the inspection but staff was told that they properly maintain and operate the scrubber in accordance with the OM&M Plan.

2. The permittee shall not operate a thin down tank unless the condenser is installed, maintained, and operating properly in accordance with the operation and maintenance plan maintained on site. (R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)

**AQD Comment:** Appears to be in COMPLIANCE. This was not in operation during the inspection but staff was told that they properly maintain and operate the condenser in accordance with the OM&M Plan.

## IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall equip and maintain the scrubber with a pressure drop indicator and a liquid flow indicator. (R 336.1205(3), R 336.1301, R 336.1331, R 336.1910)

**AQD Comment:** Appears to be in COMPLIANCE. The scrubber is equipped with both indicators.

2. The permittee shall equip and maintain the condenser with an exhaust gas temperature monitor. (R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)

**AQD Comment:** Appears to be in COMPLIANCE. The condenser is equipped with this monitor.

## VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE.

2. The permittee shall monitor the pressure drop across the scrubber in accordance with the operation and maintenance plan maintained on site. (R 336.1205(3), R 336.1301, R 336.1331, R 336.1910)

**AQD Comment:** Appears to be in COMPLIANCE. When in operation, staff was told the facility monitors the pressure drop in accordance with their OM&M Plan.

3. The permittee shall monitor the liquid flow rate of the scrubber in accordance with the operation and maintenance plan maintained on site. (R 336.1205(3), R 336.1301, R 336.1331, R 336.1910)

**AQD Comment:** Appears to be in COMPLIANCE. When in operation, staff was told the facility monitors the liquid flow rate in accordance with their OM&M Plan

4. The permittee shall monitor the exhaust gas temperature of the condenser in accordance with the operation and maintenance plan maintained on site. (R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)

**AQD Comment:** Appears to be in COMPLIANCE. When in operation, staff was told the facility monitors the exhaust gas temperature in accordance with their OM&M Plan.

5. The permittee shall keep the following information for EURESIN:

- a) Monthly and 12-month rolling time period amount, in gallons, of each product produced and the total for all products. (R 336.1205(3), R 336.1702(a))
- b) Monthly and 12-month rolling time period number of batches produced and the size and cleaning frequency of the equipment. (R 336.1205(3), R 336.1702(a))
- c) The formulation of each product produced including the VOC, individual HAP, and total HAP contents. (R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)
- d) Calculations of the monthly and 12-month rolling time period VOC emission rates using the production, cleaning, and formulation records. (R 336.1205(3), R 336.1702(a))
- e) Record of the pressure drop across the scrubber, liquid flow rate of the scrubber, and the exhaust gas temperature of the condenser in accordance with the operation and maintenance plan maintained on site. (R 336.1205(3), R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1901)

The permittee shall keep all records on file and make them available to the Department upon request.

**AQD Comment to conditions 5.a through 5.e Above:** Appears to be in COMPLIANCE. Records are now being kept in a 12-month rolling format and they are keeping records of the pressure drop, liquid flow, and exhaust gas temperature as required.

### 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. SVKETTLE	24	40	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)
2. SVTHIN	3	33	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)

**AQD Comment:** Appears to be in COMPLIANCE. The stacks appear to meet these requirements.

#### 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
FGSUPPORT	The support operations at the facility; consisting of solvent reclamation, tote/tank cleaning and tote repainting.	EUTOTECLEAN, EUTOTECLEAN2, EUTOTEREFURB, EURECLAIM
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment.	

**FGSUPPORT.** This emission unit consists of the tote cleaning operation, tote refurbishing operation, and solvent reclamation unit. The totes are used in the paint manufacturing process and solvents are used to clean them. The facility has a solvent reclamation unit equipped with a condenser to recover some of the solvent used, but it was not in use during staff's walk through of this building and neither tote cleaner was in operation either. Both tote cleaners are equipped with a sensor that won't allow operation unless the lid is closed properly. Staff then stopped by the paint booth that is used for refurbishing the tanks. It was not in use but it had filters installed.

**The following conditions apply to: FGSUPPORT**

**DESCRIPTION:** The support operations at the facility; consisting of solvent reclamation, tote/tank cleaning and tote repainting.

Emission Units: EUTOTECLEAN, EUTOTECLEAN2, EUTOTEREFURB, EURECLAIM.

POLLUTION CONTROL EQUIPMENT: NA

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	7 tpy	12-month rolling time period as determined at the end of each calendar month	FGSUPPORT	SC II.1, SC II.3, SC III.1, SC IV.1, SC VI.1	R 336.1205(3), R 336.1702(a)
2. VOC	1.4 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	EUTOTECLEAN2	SC II.2, SC VI.1	R 336.1225

**AQD Comment:** Appears to be in COMPLIANCE. For the most recent 12 month rolling time period ending February 2021, records reviewed indicate VOC emissions at 0.9 tons for FGSUPPORT. They didn't have VOC emissions broken out for EUTOTECLEAN2 individually, but they would still be under the limit as noted by the 0.9 tons reported for the whole flexible group. Staff will make the facility aware of this.

**II. MATERIAL LIMITS**

1. The permittee shall not use more than 24,000 gallons of cleaning solvent in EUTOTECLEAN and EUTOTECLEAN2, combined, per 12 month rolling time period as determined at the end of each calendar month. (R 336.1205(3), R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE. Records reviewed indicate that they've used approximately 12,000 gallons for the most recent 12 month rolling time period ending February 2021.

2. The permittee shall not use more than 1,400 gallons of coating in EUTOTEREFURB per 12 month rolling time period as determined at the end of each calendar month. (R 336.1205(3), R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE. Records reviewed indicate that they've used approximately 29 gallons of coating for the most recent 12 month rolling time period ending February 2021.

3. The permittee shall not process more than 150,000 gallons of wash solvent in EURECLAIM per 12 month rolling time period as determined at the end of each calendar month. (R 336.1205(3), R 336.1702(a))

**AQD Comment:** Appears to be in COMPLIANCE. Records reviewed indicate approximately 12,300 gallons of wash solvent have been used in the most recent 12 month rolling time period ending February 2021.

### **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate EUTOTECLEAN or EUTOTECLEAN2 unless the associated cover is closed and sealed in accordance with the operation and maintenance plan maintained on site. (R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)

**AQD Comment:** Appears to be in COMPLIANCE. Neither tote cleaner was not in operation while staff was present but they did have covers and seals in accordance with their OM&M Plan.

### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall equip and maintain EUTOTECLEAN and EUTOTECLEAN2 with “lid secure sensor” interlocks that prevent operation if the cover is not properly closed. (R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)

**AQD Comment:** Appears to be in COMPLIANCE. Both cleaners are equipped with a lid secure sensor.

2. The permittee shall not operate EUTOTEREFURB unless the overspray filter is installed, maintained, and operating properly in accordance with the operation and maintenance plan maintained on site. (R 336.1205(3), R 336.1301, R 336.1331)

**AQD Comment:** Appears to be in COMPLIANCE. The refurb spray booth was not in use while staff was present but it had filters in place.

### **VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall keep the following information for FGSUPPORT:

a) Monthly and 12-month rolling time period amount of cleaning solvent usage, coating usage, and wash solvent processing rates, in gallons. (R 336.1205(3), R 336.1702(a))

b) The composition of each cleaning solvent, coating, and wash solvent, including the VOC, individual HAP, and total HAP contents. (R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)

c) Calculations of the monthly and 12-month rolling time period VOC emission rates using the material usage and composition records. (R 336.1205(3), R 336.1702(a))

d) Calculations of the monthly and 12-month rolling time period VOC emission rates for EUTOTECLEAN2 using the cleaning solvent usage and composition records. (R 336.1205(3), R 336.1702(a))

The permittee shall keep all records on file and make them available to the Department upon request.

**AQD Comment to 1.a through 1d above:** Appears to be in COMPLIANCE. The records are now being kept in a 12-month rolling format where applicable.

### **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. SVREFURB	6	6	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)

**AQD Comment:** Appears to be in COMPLIANCE. The stack appears to meet these requirements. It is just exhausted out the side of the building.

**FGFACILITY.** This emission unit encompasses all previous mentioned emission units as well as any permit exempt equipment. All cold cleaners staff noted during the inspection had lids closed and instructions posted on them. The facility still has five of them spread out in the various buildings. The solvent they use in them is still their own and is called T-163 Solvent Blend.

The following conditions apply Source-Wide to: FGFACILITY

**POLLUTION CONTROL EQUIPMENT:**

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	40 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2, SC VI.3	R 336.1205(3), R 336.1702(a)
2. Each Individual HAP	Less than 9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2, SC VI.3	R 336.1205(3)
3. Aggregate HAPs	Less than 22 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2, SC VI.3	R 336.1205(3)

**AQD Comment to 1 through 3 Above.** Appears to be in COMPLIANCE. Records review indicate VOC emissions at about 6 tons, individual HAPs at around 0.2 to 0.9 tons each with Xylene being the highest, and total HAPs at 1.8 tons for the most recent 12 month rolling time period ending February 2021.

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall keep a separate written record for each emission unit of all equipment installations and modifications made to each emission unit. These records shall be kept on file for the life of the equipment and made available to the Department upon request. (R 336.1201)

AQD Comment: Appears to be in COMPLIANCE. Staff was told that no modifications to any equipment have been made.

2. The permittee shall keep a separate written record of the monthly and 12-month rolling time period VOC, individual HAP, and total HAP emission rates from the stationary source. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1205(3), R 336.1702(a))

AQD comment: Appears to be in COMPLIANCE. Appears to be in COMPLIANCE. The records are now being kept in a 12-month rolling format.

3. The permittee shall develop, implement, and maintain an approvable operation and maintenance plan for the facility. The plan shall include operating and monitoring parameters and maintenance requirements for air pollution control equipment to ensure the equipment performs properly. (R 336.1205(3), R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1901)

AQD Comment: Appears to be in COMPLIANCE. The facility has an OM&M plan and appear to be monitoring and recording the proper operating parameters of their pollution control equipment now when it is in operation.

**INSPECTION SUMMARY:** The facility appears to be in COMPLIANCE with the applicable requirements of PTI No. 285-00A. As for other potential regulations, staff had been told in the past by the facility that they aren't subject to 40 CFR Part 63 Subpart CCCCCC for the Paint and Allied Products Manufacturing. Since the AQD is not delegated to enforce this regulation by the EPA, staff has never looked into it any further to see if their determination is accurate. Staff departed the facility at approximately 12:10 p.m.

NAME Matt DeR

DATE 3-25-21

SUPERVISOR R.L. 4/9/21