

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

N374747634

FACILITY: JVIS MFG., LLC		SRN / ID: N3747
LOCATION: 1285 N CRYSTAL AVE, BENTON HARBOR		DISTRICT: Kalamazoo
CITY: BENTON HARBOR		COUNTY: BERRIEN
CONTACT: Jason Hoose , Quality Manager		ACTIVITY DATE: 01/16/2019
STAFF: Matthew Deskins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On January 16, 2019 AQD Staff (Matt Deskins) went to conduct an unannounced scheduled inspection of the JVIS Manufacturing (JM) (SRN: N3747) facility located in Benton Harbor, Berrien County. The purpose of the inspection was to determine JM's compliance with their Opt-Out Permit (PTI No. 202-95E), Permit Exemption No. 287(c), Consent Order Nos. 34-2013 and 16-2016, and any other state and/or federal regulations. The facility had entered into Consent Order No. 34-2013 with the AQD for violations of their opt-out emission limits for VOC and Acetone. The Consent Order took effect on March 5, 2014 and as part of the Compliance Plan the facility had to submit a new PTI that had to include an air pollution control device for VOC emissions. This ultimately resulted in the facility installing a Regenerative Thermal Oxidizer (RTO). This Consent Order was to be effective for 3 years and could be terminated; however, the facility hasn't requested this to date. Consent Order No. 16-2016 was entered into because the facility failed to conduct semi-annual smoke tests on the Non-Fugitive Enclosure of their main painting system and for not maintaining Rule 287(c) records on the paint booth they installed under that exemption. That Consent Order had an effective date of April 25, 2016 and also was to be in effect for 3 years. That Consent Order could be terminated in a few months if requested. Staff will make the facility aware of the status of both Consent Orders during the inspection. Staff departed for the facility at approximately 9:20 a.m.

Staff arrived at the facility at approximately 10:30 a.m. Staff noted that winds were out of the N/NW so they staff was not able to do any odor monitoring but the AQD hasn't received any odor complaints since they installed the RTO. Staff then looked to see if there were any visible emissions coming anywhere from the facility and none were observed. Staff then proceeded to the reception/office area of JM. Upon entering, staff tried using the phone to contact JM's Human Resources personnel to let them know staff was present but no one answered. Staff then noticed someone walking by in the window of the locked door and staff knocked to get their attention. They opened the door and staff introduced them self, stated the purpose of the visit, and asked if Jason Hoose was available. Jason was who staff typically has met with during previous inspections. She said that Jason was currently at their other facility in Benton Harbor and that staff probably needed to meet with Steve Hudzinski. She said she would page him to let them know staff was there. About 10 minutes later Brad Mann and Steve came out to greet staff. Staff introduced them self and stated the purpose of the visit. Staff exchanged business cards and then mentioned that the inspection would entail such things as viewing the facilities operations and their painting operations, and then reviewing the records required to be kept by their permit. Brad and Steve mentioned that they were temporarily handling EH&S matters until they can get the position filled. They mentioned the former EH&S person was let go. Brad and Steve then led staff back to Brad's office. Once in Brad's office staff asked some general questions about JM's operations prior to the plant walk through and a review of records. Staff also mentioned to Brad and Steve about the two Consent Orders and their current status. Brad mentioned he would look into them. The following is a summary of staff's discussions with Brad and Steve, the facility walk through, their permit conditions, and their compliance status with them as well as the Consent Orders.

According to Brad and Steve, all of JM's work is still strictly 100% automotive now and revolves around plastic injection molding of vehicle parts (mainly interior) and then painting them and/or assembling them if necessary. They said that they used to do some aftermarket parts such as mud flaps and tool boxes but that is no longer the case. They said the majority of their current business comes from Chrysler-Fiat and GM but said that they should be getting some business from Ford and Tesla coming up. They went on to say that they still are producing the Integrated Center Stack for the Jeep Grand Cherokee and Console Bezels, Glove Box Doors, Parking Brake Handles, etc. for other Chrysler-Fiat and GM vehicles. He said that business has been steady but it has slowed down quite a bit since they aren't getting as much RAM truck work currently. They said that currently they employ 90 people which includes both office and production personnel. Staff noted during their previous inspection that they had employed approximately 160-170 people. They said that they've been operating 3 shifts Monday through Friday with an occasional Saturday if necessary but they only paint on the 1<sup>st</sup> shift (8 hours).

Staff then asked if any equipment had been added or removed since staff's last inspection. They said that nothing has been added except for swapping out of the fabric filters in favor of water curtains under EUPLASTICPARTS which they had submitted a PTI to do. They said they still have the 6 paint booths and 4 ovens covered under that Opt-Out Permit. The equipment contained under EUPLASTICPARTS is controlled by the Non-Fugitive Enclosure (NFE) and RTO. They said that they still only have the one spray booth operating under the AQD Rule 287(c) permit exemption now and that the other two had been rolled into the Opt-Out Permit previously. As mentioned during the previous inspection, they said that they had added several robotic paint sprayers to several paint booths to improve transfer efficiency. Staff then asked about the RTO and how it has been running. They said it runs great and they are getting ready to have their contractor come in to do a 2-day routine annual maintenance on it where they go through the whole unit and replace things if needed. It was about this time when Jason Hoose arrived from their other facility. Staff greeted Jason and summarized the discussions that staff had with Brad and Steve so far.

Staff then proceeded with all of them out into the manufacturing area. The plant itself consists of 20 injection mold presses, assembly operations, paint operations, maintenance operations, warehouse operations, and shipping operations. The plastic injection mold presses are of various sizes that range from 28 to 1000 tons. All the injection presses are automated and the process basically consists of plastic resin beads being added to an injection press where they then get heated up and once they reach a certain temperature, are pressed/injected into a die mold. Once cooled, the die mold releases the part and it is ejected from the machine. These machines are exempt from needing a permit under the AQD Rule 286.

We then proceeded over to the painting equipment that is operated under PTI No. 202-95E. Staff noted that it is a conveyerized system and it starts off by placing the parts on the hooks attached to the conveyor. The parts then go through a 5-stage wash system (phosphate cleaner) and then through a dry off oven. The parts then proceed to the paint booth area which is surrounded by the Negative Fugitive Enclosure (NFE). The parts will then be painted in one of the booths either robotically or manually depending on the part and paint color. According to Brad, they hardly do any manual painting in this area and only one booth is set up for it. They said that most of the booths are for applying the basecoats and just one is used for applying the top coat. Staff noted that the new water curtains were in place and Brad mentioned that the "paint sludge" that is generated will get bagged up and shipped out as waste. The parts then go into a cure oven which was operating at 177 degrees F. After curing, the parts will either get boxed up for shipment or go to their "masking" coating operation which is done in an enclosed booth outside the NFE but still has its emissions controlled by the RTO. The facility calls the operation masking but it is typically a High or Low Gloss Black Paint that is being applied. There is another booth adjacent to this one also that is strictly used for touch-up work and it also has its emissions controlled by the RTO. Both of the aforementioned booths are manual paint booths. Staff noted that neither was currently being used and all filters were in place and looked clean. Next to the two masking spray booths is a masking agent cleaner. It is a heated unit that still uses Poly Chem Alternative 2000B. Staff had looked at the MSDS previously and this cleaner is VOC and HAPs free. Staff then asked Brad if they reclaim any thinners/solvents and he said no and that all waste gets shipped off site. He said that they are working with a company called Superior who they plan to send their paint wastes to so that they can reclaim it for them.

Staff then proceeded with them out to observe the RTO. It was in operation and Brad explained how it functioned. It has four stages prior to the combustion chamber with the first consisting of a blanket particulate collector and the other three with bag filters. The blanket and bag filters are changed out regularly with the earlier stages having to be changed out more frequently than the latter. Staff noted it is equipped with electronic temperature controllers and that it was operating at 1545 degrees F. Brad also showed staff a binder that contains a daily walk through checklist that employees must do to check on various RTO functions.

Staff then proceeded over to the paint room which is strictly dedicated to the storage and mixing of paints. Once the paints are mixed they are pumped through pipes to the paint booth where that color is needed. Years ago they use to just mix it in a barrel and would then haul the barrel to the paint booth where it was needed. It appears that the mixing operation would be permit exempt under the AQD Rule 287(k).

Staff then proceeded over to the spray booth operating under the AQD Rule 287(c) permit exemption. It was being used and staff noted that the filters were in place and looked reasonably clean. This booth is not controlled by the RTO and just exhausts outside.

Staff then proceeded with them over to the warehouse and maintenance areas which are located on each end of the building. All the equipment in the two maintenance areas are for machining type operations which are exempt under the AQD Rule 285(vi). There is also a welding operation in one of the maintenance areas which is

exempt under the AQD Rule 285(i). Also, all coated hooks from the painting operations are shipped out to have the coatings burned off.

Staff then proceeded with them back to Brad's office to look at records. Brad mentioned that they had all the information on spreadsheets, but the last few months needed to be entered into the computer and updated since the former EH&S had not done so prior to being let go. Staff said that was fine and that Brad could e-mail them to me. Brad e-mailed their records to staff on January 18, 2019 and the following are the special conditions contained within PTI No. 202-95E and the facilities compliance status with them.

**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
EUPLASTICPARTS	Plastic automotive interior parts coating line consisting of six (6) booths utilizing high volume low pressure (HVLP) or comparable applicators, and two (2) natural gas fired and two (2) electric ovens. The VOC emissions from this line will be controlled by Non-Fugitive Enclosure (NFE) and a regenerative thermal oxidizer (RTO). The particulate emissions controlled by a water curtain.	05-15-1995 / 09-03-2010 / Permit Issuance Date	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.			

The following conditions apply to: EUPLASTICPARTS

**DESCRIPTION:** Plastic automotive interior parts coating line consisting of six (6) booths utilizing high volume low pressure (HVLP) or comparable applicators, two (2) natural gas fired and two (2) electric ovens.

Flexible Group ID: FGFACILITY

**POLLUTION CONTROL EQUIPMENT:** The VOC emissions from the line will be controlled by Non-Fugitive Enclosure (NFE) and RTO. Particulate matter will be controlled by a water curtain.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
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Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC and Acetone combined	68.5 tpy	12-month rolling time period as determined at the end of each calendar month	EUPLASTICPARTS	SC VI.4	R 336.1702(a) R 336.1224 R 336.1205

AQD Comment: Appears to be in Compliance. Records reviewed by staff indicate the 12-month rolling VOC emissions ending December 2018 at 3.53 tons.

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall capture all waste coatings, reducers, solvents and thinners and shall store them in closed containers. The permittee shall dispose of all waste coatings, reducers, solvents and thinners in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1225, R 336.1702(a))

AQD Comment: Appears to be in Compliance. Staff did not note any open containers and staff will assume that they dispose of their wastes according to regulations. Brad said that Heritage Crystal Clean currently handles their liquid waste but they will be switching shortly to Superior. He said that ERG handles all their paint sludge waste.

2. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1224, R 336.1225, R 336.1702(a))

AQD Comment: Appears to be in Compliance. Staff did not note any open containers except where mixing was occurring in the paint room.

3. The permittee shall not operate EUPLASTICPARTS unless a malfunction abatement plan (MAP) as described in Rule 911(2) has been submitted within 180 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)

AQD Comment: Appears to be Compliance. The facility has submitted a MAP to the AQD that meets the above requirements. The MAP has not needed to be updated to date.

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate any booth in EUPLASTICPARTS unless their respective water curtain is installed, maintained and operating in a satisfactory manner. (R 336.1224, R 336.1301, R 336.1331, R 336.1910)

**AQD Comment:** Appears to be in Compliance. Staff noted that the water curtains were installed and in use.

2. The permittee shall equip and maintain EUPLASTICPARTS with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. (R 336.1702(a))

**AQD Comment:** Appears to be in Compliance. The facility uses HVLP spray guns but staff did not inquire about test caps.

3. The permittee shall not operate EUPLASTICPARTS unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC capture efficiency of 100% percent (by weight), a minimum VOC destruction efficiency of 95% percent (by weight), maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. (R 336.1225, R 336.1702, R 336.1910)

**AQD Comment:** Appears to be in Compliance. The facility uses a NFE so capture efficiency should be really high. The RTO was tested and it indicated a destruction efficiency of 96.5%. The facility operates the RTO above 1500 degrees F and staff noted it was at 1545 degrees F during the inspection.

4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor the temperature on a continuous basis, during operation of EUPLASTICPARTS. (R 336.1702)

**AQD Comment:** Appears to be in Compliance. The RTO is equipped with thermocouples and the temperature is recorded electronically.

5. The permittee shall not operate any portion of EUPLASTICPARTS unless the NFE is installed, maintained and operated in a satisfactory manner. Satisfactory operation requires that the NFE is operating at a pressure lower than all adjacent areas, so that air flows into the NFE through all natural draft openings (NDOs). NDO is defined as any opening that is not connected to a duct in which a fan or blower is installed. (R 336.1702(a))

**AQD Comment:** Appears to be in Compliance with the above.

#### **V. TESTING/SAMPLING**

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

1. The permittee shall determine the VOC content, water content, and density of any coating as applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. (R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))

**AQD Comment:** Will consider them to be in Compliance at the present time. Staff mentioned to the facility that if they wish to use manufacturer's formulation data then a request to the District AQD Supervisor needs to be submitted to do so. If the request was denied for some reason, then they would have to test a couple of their most widely used coatings using Method 24.

2. Within 60 days of achieving the maximum production rate but not later than 180 days after commencement of trial operation, verification of capture efficiency (as required by SC V.3) and verification of destruction efficiency of the RTO by testing at owner's expense, in accordance with Department requirements, will be required. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD Technical Programs Unit and District Office. The final plan must be approved by the AQD prior to testing. Verification of capture and destruction efficiencies includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office, within 60 days following the last date of the test. (R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)

**AQD Comment: Appears to be in Compliance. The facility conducted the testing and submitted the results within the timeframes mentioned above.**

3. During the initial performance test of the NFE for EUPLASTICPARTS, and semi-annually thereafter, the permittee shall verify that the direction of air flow at each natural draft opening (NDO) is into the NFE, using a smoke test (i.e., smoke bomb, smoke tube) or an approved alternate method. The permittee shall notify the AQD District Supervisor in writing at least 15 days before the test is scheduled. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of air flow direction includes the submittal of a complete report of the test results to the AQD District Supervisor within 30 days following the date of the test. After two consecutive tests demonstrate that the direction of air flow at each NDO is into the non-fugitive enclosure, the permittee may submit a request for a change in the testing frequency to the AQD District Supervisor for review and approval. (R 336.1225, R 336.1702(a))

**AQD Comment: Appears to be in Compliance. The facility has been notifying the AQD of and has been conducting the semi-annual smoke tests on the NFE.**

#### **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 336.1205, R 336.1224, R 336.1702)

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

2. The permittee shall monitor and record in a satisfactory manner, the temperature in the RTO on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. (R 336.1702)

**AQD Comment: Appears to be in Compliance. Temperatures are recorded electronically.**

3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, catalyst, solvent and thinner, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702)

**AQD Comment: Appears to be in Compliance. The facility appears to maintain SDS for all the products that they use.**

4. The permittee shall keep the following information on a calendar month basis for EUPLASTICPARTS:
  - a) Gallons (with water) of each coating, reducer, purge and clean-up solvents and catalyst, used and reclaimed.
  - b) VOC and acetone content (with water) of each coating as applied.
  - c) VOC and acetone combined mass emission calculations determining the monthly emission rate in tons per calendar month.
  - d) VOC and acetone combined mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

**The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205, R 336.1224, R 336.1702)**

**AQD Comment: Appears to be in Compliance. They have an Excel spreadsheet set-up that tracks all of the above.**

#### **VII. REPORTING**

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation,

construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EUPLASTICPARTS. (R 336.1201(7)(a))

AQD Comment: Appears to be in Compliance. The facility sent notification to the AQD.

**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. SV-RTO	54	35	R 336.1225, 40 CFR 52.21 (c) & (d)

AQD Comment: Appears to be in Compliance. The stack appears to meet the dimensions above.

**IX. OTHER REQUIREMENTS**

1. The permittee shall operate under Permit to Install No. 202-95B until successful installation of the RTO, but no later than August 15, 2014. Within seven days of successful installation and operation of the RTO, the permittee shall notify the AQD District Supervisor and AQD Permit Engineer, in writing, as to the date these activities were completed. PTI No. 202-95B shall be voided by AQD Permits on or before August 15, 2014, upon receipt of void request from the facility. (R 336.1201(7)(a)).

AQD Comment: Appears to be in Compliance. The AQD received the above notification.

**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
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	EUPLASTICPARTS

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
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Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)

AQD Comment: Appears to be in Compliance. Records reviewed indicate the highest individual HAP (4-Methylpentan-2-one) at 0.208 tons and aggregate HAPs at 0.315 tons for the 12-month rolling time period ending December 2018.

**V. TESTING/SAMPLING**

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

1. The permittee shall determine the HAP content of any HAP containing materials including coatings, reducers, solvents and thinners as received and as applied using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. (R 336.1205(3))

AQD Comment: Appears to be in Compliance. The facility uses SDS information.

**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 336.1205(3))

AQD Comment: Appears to be in Compliance.

2. The permittee shall keep the following information on a calendar month basis for FGFACILITY:
  - a) Gallons or pounds of each HAP containing material used.
  - b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
  - c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
  - d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
  - e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3))

AQD Comment: Appears to be in Compliance. They have an Excel spreadsheet set-up that tracks all of the above.

**RULE 287(C) Spray Booth (Facility refers to it as the Flaw Repair Booth):** Appears to be in Compliance.

Records reviewed showed the highest paint usage in one month being at 155 gallons during the past calendar year.

**INSPECTION SUMMARY:** The facility appears to be in COMPLIANCE with the conditions of PTI No. 202-95E, Rule 287(c) and Consent Order Nos: 34-2013 and No.16-2016 at the present time. Staff has reminded them about terminating the Consent Orders and that the Consent Orders contain the information regarding who to address the termination request to and what information it must contain. Also, staff mentioned that they had to submit a



request to staff's supervisor to use Manufacturer's formulation data (SDS) for determining VOC content of the products they use. If for someone reason their request didn't get approved then they would have to test a couple of their most widely used coatings using EPA Method 24. They said that they understood. Staff thanked them all for their time and departed the facility at approximately 12:20 p.m.

NAME Matt Dahl

DATE 1-22-19

SUPERVISOR RIL

