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

N374766530

FACILITY: JVIS MFG., LLC		**SRN / ID:** N3747
LOCATION: 1285 N CRYSTAL AVE, BENTON HARBOR		**DISTRICT:** Kalamazoo
CITY: BENTON HARBOR		**COUNTY:** BERRIEN
CONTACT: Tim Lane , Plant Manager		**ACTIVITY DATE:** 02/28/2023
STAFF: Matthew Deskins	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On February 28, 2023 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 have been terminated back in April of 2019, but like the other Consent Order, a request to do so had never been submitted. Staff will again make the facility aware of the status of both Consent Orders during the inspection. Staff departed for the facility at approximately 9:25 a.m.

Staff arrived at the facility at approximately 10:30 a.m. Staff 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 noticed the door from the lobby was open into the office area. Staff proceeded to the 1st office door and got the attention of an employee. Staff then introduced themself and asked if Brian Mann or Jason Hoose were available. Brian and Jason were two of the people staff had met with during the previous inspection. The employee stated that Jason was no longer with the company. She also stated that Brian had left the company but had then come back but was now with the paint group(?). She mentioned that staff would probably need to meet with Tim Lane who is the Plant Manager. She then asked staff if they had a business card to which staff said that they did and gave her one. She then asked staff to wait back in the lobby and she would let Tim know staff was present. She ended up coming back out a few minutes later and said that Tim was finishing up with a meeting but would be out shortly. Staff thanked her for her time and waited for Tim's arrival.

A few minutes later Tim and Herman Barry (Paint Engineer) came out to greet staff. Staff introduced them self and stated the purpose of the visit. Tim mentioned that it was ironic that staff had shown up and asked if it was because of the visit that they

had recently from LARA. He went on to mention that they currently weren't using the water curtains at full capacity in the paint booths since they were having a blockage issue and thought that the employee from LARA had told staff. He then mentioned that they have parts on order to fix the issue. Staff mentioned that they weren't contacted by anyone and that it was just coincidence and that the AQD does unannounced inspections. Staff then mentioned about the facilities air permit and Tim mentioned that he had become aware of it following an audit by their consultant (BB&E). Staff then asked if they had a conference room where staff could discuss the permit, the facilities current operations, and some other things. Tim said that would be fine and led us all into a conference room.

Once in the conference room we exchanged business cards and staff explained how the AQD does their inspections along with their frequencies. Staff then mentioned some historic issues that the AQD has had with JM and that there were still two active Consent Orders in place due to them that were never terminated. Tim then excused himself so he could retrieve a note pad to write things down. Once he returned, staff went over a few items again and then asked some general questions about JM's operations prior to the plant walk through and a review of records. The following is a summary of staff's discussions with Tim and Herman, the facility walk through, their permit conditions, and their compliance status with them as well as the Consent Orders.

According to Tim and Herman, all of JM's work is still 100% automotive 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 but not very often anymore. They said the majority of their current business comes from Stellantis but that they do some Tier 2 jobs (OEM Parts) for Ford. They said that they use to do more for GM but now it seems that they do very little except for some Corvette parts. They went on to say that some of the parts they manufacture are Inside Door Latches (Whole Assembly), Speaker Bezels, Dash Covers, etc. Staff then asked how business has been and Tim mentioned that it has been up and down with a lot of unpredictability since the COVID Pandemic. Staff then asked how many people they employ and Tim mentioned that at last count it was around 210. He said that number changes on any given day or week because it's been hard to get and retain employees. Staff then asked about their current work schedule and was told that that they've been operating 3 shifts Monday through Friday for the injection molding operations and that they paint on the 1st two shifts. They said that they will work an occasional Saturday if necessary.

Staff then asked if any equipment had been added or removed since staff's last inspection. Staff then showed them the equipment listed in the permit for their main operations that were listed under EUPLASTICPARTS. They said that out of the original 6 paint booths and 4 ovens listed under that EU that they removed 1 of the manual spray booths along with its associated electric oven. Out of the 5 booths now remaining under that EU, 1 is for manual spraying, 3 are robotic, and the last booth is empty with no spray equipment in it. The equipment contained under EUPLASTICPARTS is controlled by the Non-Fugitive Enclosure (NFE) and RTO. 4 of the 5 booths are within the NFE and 1 is located outside and adjacent to it. Staff then asked about the RTO and how it has been running. They said it runs great and that the manufacturer (Durr Environmental) comes out to service it as needed. Staff then asked if they had been doing any "Smoke Tests" of the NFE that are required to be

done semi-annually. Tim said he wasn't aware of them and Herman said that he recalls them being done in the past, but not recently. Staff mentioned that the AQD is supposed to get notified 15 days prior to them being done and according to our file information, April of 2019 was when the last one was done. Staff also asked if any testing of their coatings have been analyzed using the EPA Test Method 24 and neither were aware if they had. Staff then mentioned that during the previous inspection that they had told Brad that they would either need to test a couple of their most widely used coatings and/or request an approval from my supervisor to use Manufacturer's Formulation Data. Staff mentioned that a request was never received by us.

Staff then proceeded with Tim and Herman out into the manufacturing area. The plant itself consists of 28 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 150 to 1200 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 conveyorized system and it starts off by placing the parts on the hooks attached to the conveyor. The parts then go through a 4-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 Tim and Herman, of the 4 booths directly in the NFE one booth is called Basecoat/Prime 1, another Basecoat 2, another Topcoat/Clearcoat, and the 4th one is empty as mentioned earlier. Staff noted that the water curtains didn't appear to be functioning as Tim had mentioned earlier. After the parts are painted they then go into a cure oven which was operating at 175 degrees F. After curing, the parts will either go to assembly or get boxed up and shipped. They used to have a "masking" coating operation but they don't do that anymore. Staff then asked them if they reclaim any thinners/solvents and they said no and that all waste gets shipped off site and Crystal Kleen handles it for them.

Staff then proceeded with them out to observe the RTO. 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. Tim mentioned that after seeing the filter set-up of the RTO he was wondering why they went with water curtains on the spray booths since it looks like anything would be caught by the RTO pre-filters. Staff said they didn't know and that possibly it was just because of build-up or something. They then went on to state that the blanket and bag filters are changed out regularly with the earlier stages having to be changed out more frequently than the latter. Staff then took out the AQD Rangefinder to measure the height of the stack. After taking numerous readings, the averaged out at 11.4 yards which equates to 34.2 feet. The minimum height distance listed in the permit is 35 feet which staff thought was close enough to consider it to be compliant. Staff then proceeded with Tim and Herman

into the control room of the RTO. Staff noted it is equipped with electronic temperature controllers and that it was operating at 1560 degrees F. Staff then asked if they were still maintaining the maintenance / daily walk-through checklist. Herman said that they were and it is located just inside the plant door. We then proceeded back inside the plant and Herman showed me the binder where the records were being kept.

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 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 the conference room. Once in the conference room, staff mentioned the records that they would need to see. Tim mentioned that wouldn't be a problem and that he would get with his corporate contact about them. He mentioned staff would probably receive them before they got back to their office. Staff said that would be great and would review them as soon as possible. Staff mentioned that although an official compliance determination wouldn't be made until after the records review, there would be a violation notice forthcoming for not testing the NFE, for not testing any of the coatings since they didn't request and receive approval to use strictly manufacturer's formulation data, and for not properly operating and/or maintaining the water curtains on the spray booths.

As Tim had mentioned, staff received the e-mailed records that same afternoon. After reviewing everything, 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		05-15-1995 /	FGFACILITY

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date/ Modification Date	Flexible Group ID
	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.	09-03-2010 / Permit Issuance Date	
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
1. VOC and	68.5 tpy	12-month rolling time period as determined at the	EUPLASTICPARTS	SC VI.4	R 336.1702(a) R 336.1224 R 336.1205

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
Acetone combined		end of each calendar month			

AQD Comment: Appears to be in Compliance. Records reviewed by staff indicate the 12-month rolling VOC emissions ending January of 2023 at 10.005 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. Herman said that Heritage Crystal Clean currently handles their liquid 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: Will consider them to be in Compliance at the present time. The facility has submitted a MAP to the AQD that meets the above requirements; however, it appears that it may need updating since they've recently been having issues with the water curtain system. Staff will make the facility aware of this.

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 Non-Compliance. The water curtains were not being operated in a satisfactory manner and staff was told some piping is plugged. They said parts are on order and will be arriving shortly.

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 1560 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: Will consider them to be in Non-Compliance. It appears that the NFE hasn't been tested in approximately 4 years so staff cannot say if it is currently operating properly.

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 Non-Compliance. Staff mentioned to the facility during the previous inspection 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. A request was never submitted and no testing of their coatings has been done.

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 Non-Compliance. According to AQD file records, the last notification received by the AQD and the testing completed on the NFE was in April of 2019.

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. Staff used the AQD Rangefinder and after several measurements, the height averaged approximately 34.2 feet.

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
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	FGFACILITY	SC VI.2	R 336.1205(3)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applicable Requirements
		at the end of each calendar month			

AQD Comment: Appears to be in Compliance. Records reviewed indicate the highest individual HAP (4-Methylpentan-2-one) at 2.272 tons and aggregate HAPs at 2.947 tons for the 12-month rolling time period ending January 2023.

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.

INSPECTION SUMMARY: The facility appears to be in NON-COMPLIANCE with the conditions of PTI No. 202-95E and Consent Order No.16-2016 at the present time. Staff will send the facility a Violation Notice for the following items:

1. Failure to install, maintain, and operate the water curtain systems in the coating booths of EUPLASTICPARTS.
2. Since testing of the Non-Fugitive Enclosure (NFE) doesn't appear to have been conducted in approximately 4 years (April of 2019), staff cannot state whether it has been installed, maintained, and is being operated in a satisfactory manner.
3. The facility hasn't tested any coatings as received and/or as applied using the EPA Test Method 24. The facility also didn't request nor receive approval from the AQD District Supervisor to use Manufacturer's formulation data instead.
4. According to district records, the AQD hasn't been notified nor does it appear that semi-annual testing has been conducted on the NFE since April of 2019.

NAME Matt Deskins DATE 3-6-23 SUPERVISOR 3/6/23