

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection *S*

N521226391

FACILITY: JESCO INDUSTRIES INC		SRN / ID: N5212
LOCATION: 950 ANDERSON ROAD, LITCHFIELD		DISTRICT: Jackson
CITY: LITCHFIELD		COUNTY: HILLSDALE
CONTACT:		ACTIVITY DATE: 08/07/2014
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Meeting to determine if they are a true minor source and will be able to opt-out of the ROP program and a self-initiated inspection.		
RESOLVED COMPLAINTS:		

I arrived at the facility and met with Lori Bever, Human Resource Manager for Jesco Industries. Lori had requested a meeting to help with determining if they demonstrate that their potential to emit doesn't exceed any major source emission threshold. This facility was operating under permit to install (PTI) #557-92A and was registered under Rule 208a to remain out of the Renewable Operating Permit (ROP) program. They were registered because of the potential to emit of hazardous air pollutants (HAPs) could have been greater than 10 tons per year (tpy) for a single HAP or 25 tpy for aggregate HAPs. We reviewed their coating MSDS's and determined that they do not use any coating that contains any HAPs. Based on the information that we reviewed, we were able to determine that they are a true minor source and no longer potentially subject to the ROP program. I asked Lori to send me a letter stating this, which is all I needed at this time for our files.

I then conducted a self-initiated inspection to determine compliance with PTI # 557-92A. They have a VOC emission limit of 42 tpy based on a 12 month rolling average as determined at the end of each month. Their annual VOC emissions for the 10+ years have always been less than 8 tpy. At the time of the inspection, they were not doing the 12 month rolling averages. The all the necessary information was being kept in an Excel spreadsheet and because of this I asked that they to modify their spreadsheet to do this. She said that it would be done before the end of the week. She sent me an email later that same day telling me that they had made the correction to the formulas in the spreadsheet (see attached). Their records also showed that they were below the 3.5 pounds VOC per gallon of coating. The spreadsheet also contained all the information required by Special Condition #19, which includes identification of the coating, the VOC content, and the amount of gallons applied. They were operating the paint booths at the time of the inspection and they were meeting the required 0% opacity. They are also keeping monthly records of the cleanup and/or purge solvents used and reclaimed. We then went back into the facility so she could show me that their two paint booths of their coating operation. They usually coat the parts either with a dark grey paint or a green enamel. However on Thursdays, they paint parts with other colors that their customers request for their parts. Today, they were painting parts white in one booth and yellow in the other. She showed me their filter supply for the paint booths and told me that they change the inner and outer filters every day. The used filters are bagged in clear plastic bags and put into a dumpster.

Based on the information gathered during this meeting and inspection, I have determined that they are in compliance with PTI #557-92A. They also have demonstrated that their potential to emit doesn't exceed any major source emission threshold and therefore are not required to apply for a ROP. I thanked her for time and left.

NAME *Brian Carley*DATE 8/13/14SUPERVISOR *[Signature]*