

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

N659360791

<b>FACILITY:</b> Monroe Truck Equipment		<b>SRN / ID:</b> N6593
<b>LOCATION:</b> 2400 Reo Dr, FLINT		<b>DISTRICT:</b> Lansing
<b>CITY:</b> FLINT		<b>COUNTY:</b> GENESEE
<b>CONTACT:</b> Jeff Stevens , Assistant General Mgr./Project Engineer		<b>ACTIVITY DATE:</b> 11/12/2021
<b>STAFF:</b> Daniel McGeen	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> PCE activities, conducted as part of a FCE: 1. unannounced, scheduled inspection, and 2. review of facility recordkeeping.		
<b>RESOLVED COMPLAINTS:</b>		

On 11/12/2021, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an unannounced, scheduled inspection of Monroe Truck Equipment. At a subsequent date, AQD reviewed facility recordkeeping. These were Partial Compliance Evaluation (PCE) activities, conducted as part of a Full Compliance Evaluation (FCE). AQD is required to inspect synthetic minor/opt-out facilities such as this one once every 4 years, under the Compliance Monitoring Strategy of the U.S. Environmental Protection Agency (EPA), which AQD follows.

**Environmental contact:**

- Jeff Stevens, Assistant General Manager/Project Engineer; 810-853-6848; [jstevens@monroetruck.com](mailto:jstevens@monroetruck.com)

**AQD contacts:**

- Dan McGeen (myself), Environmental Quality Analyst; 517-648-7547; [mcgeend@michigan.gov](mailto:mcgeend@michigan.gov)
- Andrea Vera, AQD Student Intern

**Facility description:**

Monroe Truck Equipment installs custom bodies to medium duty truck chassis and cab assemblies. There are a number of options for coatings which may be applied.

**Emission units:**

Emission Unit* ID	Emission Unit Description	PTI, or Michigan Air Pollution Control (MAPC) Rule exemption	Compliance Status
EUBOOTH1	Large surface coating booth/curing oven	368-98	Compliance; not operating
EUBOOTH2	Small surface coating booth/curing oven	368-98	Compliance; not operating
EUBOOTH3	Bed liner and undercoat paint booth	Rule 287(2)(c)	Compliance; not operating

EUDISTILL	Solvent distillation unit; installed prior to 12/20/2016 revisions to exemptions	Rule 285(u)	No longer in use
Metal machining processes	Various machining processes	Rule 285(2)(l)(vi)(B)	Compliance
Welding processes	Welding units	Rule 285(2)(i)	Compliance

\*An *emission unit* is any part of a stationary source that emits or has the potential to emit an air contaminant.

#### Regulatory overview:

This facility has an opt-out permit, Permit to Install (PTI) No. 368-98, to limit its potential to emit for volatile organic compounds (VOCs) to keep it from becoming a major source for criteria pollutants. A *major source* has the Potential to Emit (PTE) of 100 tons per year (TPY) or more of any one of the *criteria pollutants*, that is, those for which a National Ambient Air Quality Standard exists. These include carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide (SO<sub>2</sub>), VOCs, lead, and particulate matter smaller than 10 microns (PM-10) and particulate matter smaller than 2.5 microns (PM<sub>2.5</sub>).

The facility's opt-out permit also limits its PTE for Hazardous Air Pollutants (HAPs), to keep it from becoming a major HAP source. The PTE is limited to 5 TPY for any single HAP and 15 TPY for aggregate HAPs, to stay below the major source threshold of 10 TPY and 25 TPY, respectively. It is therefore considered a minor or *area source* for HAPs.

When Monroe Truck Equipment accepted PTI No. 368-98, they accepted restrictions on the large and small coating booths in order to be exempted from the limits of Michigan Air Pollution Control (MAPC) Rule 621 for the metal parts painting part of their coating operation. Special Condition No. 1 of the PTI is a VOC emission rate of 12.3 lbs/hr, and 2,000 lbs/month, and 9.9 TPY. This is the restriction on emissions accepted in order to be exempt from the limits of Rule 621 which would otherwise be applicable through Rule 702(a).

There is also a coating booth onsite which was installed as exempt from needing a PTI, under Michigan Air Pollution Control (MAPC) Rule 287(c). It was installed prior to 12/20/2016, when the exemption was modified and became the current MAPC Rule 287(2)(c) exemption. Any future modifications to the booth would fall under the current version of the exemption.

It is my understanding that there is no boiler on site, just a hot water heater of less than 120 gallon capacity for the plant restrooms. A hot water heater at a minor or *area source* of HAPs would not be subject to 40 CFR Part 63, Subpart JJJJJJ, *National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers, Area Sources*, under Section 63.11195(f).

#### Fee status:

Because Monroe Truck Equipment has a synthetic minor opt-out permit which restricts its potential to emit, to opt-out of becoming a major source, it is considered to be Category E fee-subject.

This facility is required to submit an annual report to the Michigan Air Emission Reporting System (MAERS) each year.

**Location:**

The facility is south of I-69, but just north of Hill Road, and just west of US-23. It is immediately east of a residential area. The nearest houses are about 525 feet west of the plant. To the east are light industrial and commercial businesses, and US-23. To the north is undeveloped land, and to the south are commercial businesses.

**Recent history:**

The most recent inspection by AQD was conducted here on 7/2/2018, and the facility was found to be in compliance. There are no complaints for this facility in the AQD Lansing District file for Monroe Truck Equipment, which goes back to April 2003. Older records are not included in this file, and may have been sent to the State of Michigan records center.

**Stack testing:**

There are no records of any stack testing being required of this facility, as far back as the April 2003 start date of the district file.

**Required safety equipment:**

Safety glasses with side shields are required. Steel-toed boots and high visibility safety vests were also worn, as a standard precaution when visiting industrial sites.

Due to ongoing the COVID pandemic, AQD staff wore disposable paper masks, per EGLE guidance.

**Arrival:**

This was an unannounced inspection. AQD was represented today by AQD Student Intern Ms. Andrea Vera, and by myself.

We approached the facility from Hill Road, and turned north onto Hill 23 Drive. We neared the site at about 10:40 AM. To get downwind of the facility we drove north, past Reo Drive, where Monroe Truck Equipment is, and into the parking lot of a facility to the northeast. No odors were detectable. Weather conditions were partly sunny and 46 degrees F, with winds out of the south southwest at 15 miles per hour.

We then drove to Reo Drive, and arrived at the plant at 10:44 AM. There were no odors in the plant parking lot, next to the office. No visible emissions could be identified coming from the facility roofline.

Upon entering the plant office, we identified ourselves, and explained the reason for our visit. We soon met with Mr. Jeff Stevens, Assistant General Manager/Project Engineer, and with Mark, the shop supervisor.

Per EGLE guidance to field staff during the COVID pandemic, Ms. Vera and I wore disposable masks. Also per EGLE guidance, I inquired if there had been any recent confirmed COVID cases here, and was informed that there had not been.

We were informed that the plant is presently operating with four 10-hour shifts per week, due to supply chain issues. They explained that today, being a Friday, they were not actually operating in the shop, but they were very willing to show us around and explain their operations. .

#### PCE activity number 1: Inspection:

The facility "upfits," or customizes, commercial trucks for their customers by assembling parts onto pre-painted cabs and chassis that arrive at the plant. They mount snow plows, hydraulic dump bodies, running boards, and even cranes, on medium-duty trucks, including GM, Ford, Dodge Ram, and a few foreign trucks, we were told. Their customers include contractors, landscapers, and municipalities, as I understand it.

The facility's permit allows them to apply coatings in a large or a small booth. However, most of the custom equipment they install comes powder coated, we were told, and their trucks come pre-painted in white. Powder coating provides a better, more durable finish, and is done at their plant in Wisconsin, it was explained.

As I understand it, most of the coating done at the plant now is undercoating. This is applied in a third booth, exempt under Rule 287(2)(c). Spray-on bedliners are no longer applied in this exempt booth we were told.

Safety-Kleen recycles their solvents from purging and cleaning, we were informed.

We entered the 18-bay shop, and saw "bare" trucks, some of which were partway through the customization process. Some were getting quipped with dump bodies. We also saw valve panels which were partway assembled, for pending installation onto trucks for a company which applies lawn care chemicals.

#### EUBOOTH1; PTI No. 368-98:

The large permitted paint booth, EUBOOTH1, was not operating, at the time of the inspection. It is a downdraft design, with mat type filters. In 2018, I had been advised that the original high volume low pressure (HVLP) paint guns are still used. Chassis and many parts arrive at the site pre-painted, now, as discussed earlier in this report. On the rare occasion that they paint a truck body here, they are said to use the booth as a curing oven, as it can be heated to 160 degrees F. It is heated by natural gas.

For EUBOOTH1, the magnahelic pressure drop gauge currently read 0.0 inches, water column (w.c.), as the booth was not in use. The booth's process value (PV) or actual temperature was 65 degrees F, while the set point or set value (SV) was 180 degrees F. I examined the mat type filters, which appeared to be in good shape.

Please see PCE 2, review of facility recordkeeping, later in this report.

#### EUBOOTH2; PTI No. 368-98:

The small permitted paint booth, EUBOOTH2, was not operating, at the time of the inspection. It is not used very often, we were told.

EUBOOTH2 is also a downdraft booth with mat type filters. In 2018, I had been informed that the original HVLP paint guns are still used. This booth can also be used as a natural gas-fired curing oven. It was turned off, at the time of the inspection, so there were no temperature readings for PV or SV, and no pressure drop reading. We were told the pressure drop is typically 0.0 inches, w.c.

Please see PCE 2, review of facility recordkeeping, later in this report, for discussion of the booth related to VOC limits from the PTI.

### **EUBOOTH3; Rule 287(c):**

Installation of this booth was done prior to 12/20/2016 revisions of AQD's exemption rules. It was therefore installed under MAPC Rule 287(c), rather than the newer MAPC Rule 287(2)(c). Rule 287(c) exempts:

*(c) A surface coating line if all of the following conditions are met:*

*(i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.*

*(ii) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.*

*(iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.*

Any changes to the booth on or after 12/20/2016 would be subject to MAPC Rule 287(2)(c), which requires:

*(c) A surface coating line if all of the following conditions are met:*

*(i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.*

*(ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.*

*(iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.*

EUBOOTH3 is used for applying an undercoating, we were informed, but is no longer used for spray on truck bed liners. The undercoating they currently use is described as asphaltic in nature, and is called "Pure Asphalt No. 770-M" undercoating. This booth has no exhaust, so they close the doors when they paint, we were told, and afterwards, the doors are opened, into the general, in-plant environment. The air filters which I observed on the booth were said to be for make up air that enters the booth.

The attached monthly recordkeeping for calendar year 2021 shows that for the exempt booth, EUBOOTH3, the gallons of Undercoater used were below 200 gallons each month. The busiest single month was March 2021, in which 60.00 gallons of Undercoater were reported used. The total yearly volume of Undercoater used was only 320.00 gal/yr. EUBOOTH3 is well below the 200 gallons per month of coatings allowed under MAPC Rule 287(2)(c)(i). Rule 287(2)(c)(ii), which is for an exhaust system serving only coating spray equipment, is non applicable for this booth, which only exhausts into the general, in-plant environment. Lastly, coating use records are being maintained, and were made available to AQD upon request. The facility appears to be satisfying the criteria for Rule 287(2)(c)(iii).

### **EUDISTILL, Rule 285(u):**

The waste solvent still is not being used anymore, but is still onsite, we saw. We were reminded that they now use Safety-Kleen's services to remove their waste solvent.

### **Metal machining processes; Rule 285(2)(l)(vi)(B):**

Some cutting of metal takes place here. MAPC Rule 285(2)(l)(vi)(B) exempts from the requirement of MAPC Rule 201 to obtain a permit to install::

(l) The following equipment and any exhaust system or collector exclusively serving the equipment:

(vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:

(A) Equipment used on a nonproduction basis.

(B) Equipment that has emissions that are released only into the general in-plant environment.

(C) Equipment that has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

#### **Welding; Rule 285(2)(i):**

**Welding activities within the plant may be considered exempt under Rule 285(2)(i), which pertains to brazing, soldering, and welding equipment. It is my understanding that welding is done to attach dump truck bodies and flat beds to truck chassis, while utility truck bodies are bolted to the chassis.**

#### **Miscellaneous:**

**As mentioned in the AQD 7/2/2018 inspection report, occasionally, they may use a torch cutter, to cut a rusty bolt. This could potentially be considered a maintenance or repair activity, and therefore would meet the new version of the torch cutting exemption, MAPC Rule 285(2)(j), which went into effect on 12//20/2016. No torch cutting was being done at the time of the inspection. It exempts:**

***(j) Portable torch cutting equipment that does not cause a nuisance or adversely impact surrounding areas and is used for either of the following:***

***(i) Activities performed on a non-production basis, such as maintenance, repair, and dismantling.***

***(ii) Scrap metal recycling and/or demolition activities that have emissions that are released only into the general in-plant environment and/or that have externally vented emissions equipped with an appropriately designed and operated enclosure and fabric filter.***

#### **PCE activity number 2: review of facility recordkeeping:**

**Mr. Stevens explained that a consulting firm, Foth & Van Dyke, assists with their recordkeeping.**

**On 2/16/2022, I emailed J. Stevens, to request that copies of facility recordkeeping be sent, to be checked against the permit limits. I received the attached records on 3/3/2022.**

#### **Review of PTI No. 368-98 Special Conditions, including discussion of recordkeeping:**

**PTI No. 368-98 refers to the large paint booth, EUBOOTH1 and the small paint booth, EUBOOTH2 as "the coating process."**

**Special Condition (SC) No. 1 of PTI No. 368-98 limits VOC emissions from the coating of metal parts as follows:**

**12.3 lb/hr VOC for both booths EUBOOTH1 and EUBOOTH2 combined.**

*INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 show that hourly emissions were tracked over a 12-month rolling period. For EUBOOTH1, lb/hour paint VOC emissions over the 12-months were 4.17 lbs/hr. For EUBOOTH2, lb/hr paint VOC emissions over the 12-month period were 2.59 lbs/hr. For the two booths combined, emissions were 2.77 lbs/hr, below the 12.3 lb/hr limit.*

**2,000 lbs VOC per month for each booth.**

*INSPECTION RESULT: COMPLIANCE. Attached monthly records for calendar year 2021 show that the booths were far below the monthly limit. The highest monthly value for EUBOOTH1 was 6.0 lbs/month, in both September and October 2021. The highest monthly value for EUBOOTH2 was 32.50 lbs, in March 2021.*

**9.9 TPY VOC, for both booths combined, over a 12-month rolling time period.**

*INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 show that yearly VOC emissions for EUBOOTH1 and EUBOOTH2 combined were 0.072, far below the limit.*

**SC No. 2 of PTI 368-98 limits the total VOCs from the non-metal coating parts painting of the process, presumably from both booths combined, as the permit does not specify, to:**

**12.3 lbs/hr VOC.**

*INSPECTION FINDING: COMPLIANCE. The attached monthly records show that no coating of non-metal parts was performed in 2021. Therefore, lbs/hr VOC would be zero.*

**2.4 TPY VOC, over a 12-month rolling time period.**

*INSPECTION FINDING: COMPLIANCE. The attached monthly records show that no coating of non-metal parts was performed in 2021. Therefore, TPY VOC would be zero.*

**SC No. 3 of PTI 368-98 limits VOCs from the undercoating portion of the process, but we were told that the undercoating is currently done in the exempted paint booth under Rule 287(c). SC No. 3 limits emissions to:**

**10.3 lbs/hr VOC.**

*INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 show that hourly emissions of VOCs from Undercoater were tracked over a 12-month rolling period. The lb/hour undercoating emissions over the 12-months was 8.16 lb/hr, below the 10.3 lb/hr limit.*

**2.0 TPY VOC, based on a 12-month rolling time period.**

*INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 show that yearly emissions of VOCs from Undercoater were tracked over a 12-month rolling period. The yearly undercoating VOC emissions were 0.40 TPY, below the 2.0 TPY limit.*

**SC No. 4 limits emissions from line-purge and cleanup portion of the coating process to:**

**16.8 lbs/day VOC.**

*INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 show that over a 12-month rolling time period, VOC on a daily basis from cleanup solvents averaged out to be 1.92 lbs/day, well below the 16.8 lbs/day limit.*

**2.6 TPY VOC, based on a 12-month rolling time period. This SC is necessary to assure compliance with BACT which has been established pursuant to Rule 702a and the emission limits which have been established pursuant to Rules 205 and 225.**

*INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 show that the cleanup solvent rolling 12-month time period emission rate for VOC was 0.3 TPY, well below the 2.6 TPY limit.*

**SC No. 5 limits HAP emissions from the coating process to:**

**<5 TPY for any individual HAP at this stationary source.**

*INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 indicate that over a 12-month rolling time period, the maximum HAP emissions for a single HAP were 179.82 lbs, or 0.9 TPY for MIBK, well below the permitted limit*

**15.0 TPY for any combination of HAPs at this stationary source, based on a 12-month rolling time period.**

*INSPECTION RESULT: COMPLIANCE. The attached monthly records from calendar year 2021 contain a table of total HAPs in lbs/yr and again in lbs/mo, but the second table appears to be intended for the unit of TPY. By adding up monthly emissions in lbs and dividing by 12, I was able to reach a value for TPY very close to the value in the second HAP table. The value which I obtained by starting with lbs/month showed that for calendar year 2021, emissions for total HAPs were 0.090 TPY, far below the limit. The value in the second table of 0.087 lbs/month may be intended to be a TPY value.*

**SC No. 6 prohibits the operation of either coating booth unless all exhaust filters are in place and operating properly.**

*INSPECTION RESULT: COMPLIANCE. The exhaust filters appeared to be in place in the booths, and looked to be properly maintained.*

**SC No. 7 requires EUBOOTH1 and EUBOOTH2 to be equipped with HVLP spray guns or equivalent technology with comparable technology. This condition is necessary to assure compliance with BACT, which has been established pursuant to Rule 702.**

*INSPECTION RESULT: COMPLIANCE. It is my understanding that the original HVLP guns are still used.*

**SC No. 8 sets detailed requirements for:**

**A. For each of the two paint spray booths and both booths combined:**

1. For each coating, the identification and category. *INSPECTION RESULT: COMPLIANCE. Attached monthly records for calendar year 2021 identify each coating used.*
2. The amount, in gallons, of each coating used (with water). *Inspection finding: Attached monthly records for calendar year 2021 identified the amount, in gallons, of each type of coating used. This appeared to me to be with water.*
3. The VOC content, in lbs/gal of coating, minus water and with water, as applied. *INSPECTION FINDING: COMPLIANCE. VOC content was reported in lbs/gal, in the monthly reports. I could not find separate values for with water and without water, so I emailed J. Stevens on 9/20/2022, to inquire. He replied on 9/27: "Monroe Truck uses paints that do not contain water, and they do not think the paints with water prior to application. Therefore, the VOC content of the paints "minus water" and "with water" are the same."*
4. VOC emission calculations determining monthly emissions in tons per month for metal and non-metal coating processes. *INSPECTION RESULT: COMPLIANCE. Attached monthly records for calendar year 2021 indicate monthly VOC emissions in lbs per month for metal and non-metal coating processes, which can easily be converted into units of tons. No coatings for non-metal substrates were applied, so emissions for non-metal coating would be zero.*



5. VOC emission calculations determining a 12-month rolling time period emission rate in TPY for the metal and non-,metal coating processes. *INSPECTION RESULT: COMPLIANCE. Attached monthly records for calendar year 2021 show that VOC emissions were 0.072 TPY for EUBOOTH1 and EUBOOTH2 combined.*

#### **B. For the undercoating part of the process.**

1. The identification of (each) undercoating used. *INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 identify each type of undercoating product used.*
2. The amount, in gallons, used. *INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 identify the amount in gallons used.*
3. The VOC content of (each) undercoating used. *INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 identify the VOC content of each undercoating, reported to be 0.00.*
4. VOC emission calculations determining monthly VOC emission rates in tons per month. *INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 determine monthly VOC emissions in lbs from undercoating, and these values can easily be converted to tons per month.*
5. VOC emission calculations determining monthly VOC emission rates in TPY. *INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 determine monthly VOC emissions in lbs from undercoating, and these values can easily be converted to TPY.*

#### **C. For the booth clean-up and line purge operations.**

1. The identification of each cleanup/purge solvent used. *INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 identified the cleanup solvent used, BL 4553.*
2. The lbs/gal VOC of solvent used. *INSPECTION RESULT: COMPLIANCE. In the attached monthly records for calendar year 2021, I could not locate the lbs/gal VOC of the solvent used, only the total VOC emissions from the solvent. However, from the usage of 3.00 gallons in December of 2021, and the VOC emissions of 19.98 lbs, the value can easily be calculated, as follows: 19.98 lbs/3.00 gallons = 6.66 lbs/gal.*
3. Actual gallons of cleanup/purge solvent used. *INSPECTION RESULT: COMPLIANCE. In the attached monthly records for calendar year 2021, I saw that the actual gallons of cleanup/purge solvent used were being tracked.*
4. Gallons of cleanup/purge solvent reclaimed. *INSPECTION RESULT: COMPLIANCE. In the attached monthly records for calendar year 2021, 0 gallons of cleanup solvent were reported as reclaimed.*
5. VOC emission calculations determining monthly VOC emission rates in tons per month. *INSPECTION RESULT: COMPLIANCE. In the attached monthly records for calendar year 2021, lbs/month VOC emission rates were calculated, which can easily be converted to tons per month.*
6. VOC emission calculations determining a 12-month rolling time period emission rate in TPY. *INSPECTION RESULT: COMPLIANCE. In the attached monthly records for calendar year 2021, a VOC emission rate in TPY was provided.*

#### **SC No. 9.A requires:**

1. Monthly calculations of HAP emissions in tons per month by process. *INSPECTION RESULT: COMPLIANCE. I located individual HAP emissions in lbs/month from all processes, which could easily be converted to tons per month. I missed finding HAP emissions per month by process, and emailed J. Stevens for assistance, on 9/20/2022. On 9/27, he replied, "The paint booth individual process emission pages show HAP emissions in tons/month (PDF page 10 for Booth 1, PDF page 12 for Booth 2). The other miscellaneous materials process emissions page (PDF page 6 for undercoat and cleanup solvent) only summarizes HAP emissions in pounds/month, although the actual HAP emissions from these miscellaneous processes would be so small that they would normally round to 0.00 tons/month. Other process pages show HAP emissions in tons/month, but they are processes that are not in use (Durabed, F-Series, Rhino Linings)." I reviewed the May 2021 and December 2021 monthly reports, and confirmed HAP emissions were 0.00 tons/month for Booth 1 and Booth 2, in each month.*
2. Monthly calculation of aggregate HAPs in tons per month for all processes at the facility. *INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 include aggregate HAPS in lbs/month, which can easily be converted to tons per month.*

3. Monthly calculations of individual HAPs determining a 12-month rolling time period emission rate in TPY. *INSPECTION RESULT: COMPLIANCE. As explained by J. Stevens in his 9/27/2022 email, "PDF page 1 shows 12-month rolling HAP emissions in tons/year. The HAP emissions are shown over the last 12 months in pounds/month on this page, then totaled and divided by 2000 to come up with the rolling 12-month total in tons/month." The month in calendar year 2021 with the highest 12-month rolling value was March, with 0.030 tons of MIBK emitted.*
4. Monthly calculations of aggregate HAPs determining a 12-month rolling time period emission rate in TPY. *INSPECTION RESULT: COMPLIANCE. The attached monthly records for calendar year 2021 each have a 12-month rolling value for aggregate HAPs in TPY.*

**SC No. 10 requires the exhaust gases from the metal and non-metal painting to be exhausted unobstructed vertically upwards from stacks (one per booth) each with a maximum diameter of 30 inches at exit points not less than 32 feet above ground level.**

*INSPECTION RESULT: COMPLIANCE. The stacks appear to exhaust unobstructed vertically upwards. It was difficult to gauge the heights of the stacks, but they appear to be of the proper dimensions.*

**SC No. 11 requires all wipe rags used for parts-wipe to be stored in closed containers when not in use and disposed of in an acceptable manner. This condition is necessary to assure compliance with BACT which has been established pursuant to Rule 702, as well as Rules 225 and 901.**

*INSPECTION RESULT: NONAPPLICABLE (NA). AQD emailed the company on 9/20/2022, to inquire as to storage and disposal of any wipe rags that they use. J. Stevens replied on 9/27 that they do not use wipe rags. Therefore, this condition is currently NA.*

**SC No. 12 requires all purge solvent used in the coating process to be captured in purge cups and disposed of in an acceptable manner. This condition is necessary to assure compliance with BACT which has been established pursuant to Rule 702, as well as Rules 225 and 901.**

*INSPECTION FINDING: COMPLIANCE. We were advised that Safety-Kleen handles their solvent waste for them.*

**SC No. 13 requires the applicant to recover and reclaim a minimum of 55%, by weight, of the purge and cleanup solvent used in the coating process.**

*INSPECTION RESULT: NA. The waste solvent distillation unit is no longer used, as they do not do much painting, we were informed, so this condition does not appear to currently be applicable. We were informed that Safety-Kleen handles their waste solvent for them. I emailed the company on 9/20/2022, to ask if they know how much of the purge solvent is captured and reclaimed. J. Stevens replied that 100% of the purge solvent is captured and goes to waste. Safety-Kleen is commonly used by companies to provide proper waste disposal of used solvents.*

**(End of check of PTI Special Conditions.)**

**MAPC Rule 287(2)(c) records review for EUBOOTH3, as part of PCE No. 2, review of facility recordkeeping:**

*INSPECTION RESULT: COMPLIANCE. EUBOOTH3 is considered exempt under Rule 287(c). The attached monthly recordkeeping for calendar year 2021 shows that for the exempt booth, EUBOOTH3,*

*the gallons of Undercoater used were below 200 gallons each month. The busiest single month was March 2021, i which 60.00 gallons of Undercoater were reported used. The totaly yearly volume of Undercoater used was only 320.00 gal/yr. EUBOOTH3 is well bwlow the 200 gallons per month of coatings allowed under MAPC Rule 287(2)(c)(i).*

No violations or areas of concern were identified. Following the post-inspection discussion, we left the plant at 11:50 AM.

**Conclusion:**

There were no instances of noncompliance identified, during the inspection. Review of facility recordkeeping showed that they were in compliance with their permitted limits. Housekeeping at the facility appeared good.

NAME 

DATE 9/29/2022

SUPERVISOR RB