

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

N716458476

<b>FACILITY:</b> Quala		<b>SRN / ID:</b> N7164
<b>LOCATION:</b> 50321 E Russell Schmidt, CHESTERFIELD		<b>DISTRICT:</b> Warren
<b>CITY:</b> CHESTERFIELD		<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> Stacey Thoms , Operations Manager		<b>ACTIVITY DATE:</b> 06/10/2021
<b>STAFF:</b> Kerry Kelly	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> FY 2021 on-site full compliance evaluation. The facility reported VOC emissions greater than 100 tpy for the period ending May 2021 and appears to be in violation of the following conditions in PTI 79-03C: EU-EXTERIOR SC III.1, FG-PROCESSLINE SC I.1, SC III.2 , SC III.3, SC VI.8, SC VI.9 and FGFACILITY SC I.3.		
<b>RESOLVED COMPLAINTS:</b>		

On June 10, 2021, I (Kerry Kelly), Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division (EGLE-AQD), conducted an on-site inspection of Quala located at 50321 Russell Schmidt Drive, Chesterfield, Michigan. This facility is identified by the Air Quality Division with the State Registration Number (SRN) N7164 . The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); Michigan Administrative Rules; and Permit to Install (PTI) No. 79-03C.

### **Facility History and Description**

#### **Ownership and Compliance History**

On January 17, 2020, EGLE-AQD received a notification of change of ownership for the property located at 50321 Russell Schmidt Drive, Chesterfield, Michigan (Attachment 1). The notification contains the information in R 336.1219. Quala purchased the facility and operations from MPW Container Management Corporation (MPW).

On November 6, 2002, January 23, 2003 and April 16, 2003, EGLE-AQD issued notices of violation to MPW Container Management Corporation for allegedly violating R 336.1201 of the Michigan Administrative Code ("MAC") for installing a process without obtaining a PTI and R336.1210(7) of the MAC and Title V of the federal Clean Air Act Amendments for failing to submit a timely and administratively complete application for a Renewable Operating Permit ("ROP"). EGLE and MPW stipulated to the termination of these proceedings by entry of a Stipulation for Entry of a Final Order by Consent (Consent Order Number 16-2004), signed 8/31/2004. MPW never requested to terminate Consent Order (CO) 16-2004 and, as such, the CO remains in full force per Condition 22 of CO 16-2004.

CO 16-2004 Condition 23 requires MPW to comply with the conditions of PTI 79-03 or subsequent permits with supplanting or superceding conditions and to notify any purchaser/trustee of the consent order. Condition 23 also requires that the purchaser and/or transferee of the CO to agree, in writing, to assume applicable obligations of the CO and a copy of the agreement be forwarded to the AQD Southeast Michigan District Supervisor with 30 days of assuming the obligations of the CO. I reviewed the facility files at the AQD Warren District Office and did not see a notification indicating Quala agrees to assume applicable obligations of the CO. There appears to be no indication MPW notified Quala of the CO, as such, Jeff Rathbun, AQD Enforcement Section, advised that any violations of CO 16-2004 observed during this inspection should not be cited in a notice of violation (Attachment 2).

#### **Solvent Odors**

While conducting inspections and complaint investigations in the vicinity of Quala in the past 5 years I observed solvent odors apparently emanating from MPW/Quala. As a result, I recommended PTI 79-03C contain conditions to minimize fugitive emissions and odors, such as keeping bay doors closed while totes were being cleaned.

Most recently, on August 27, 2020, AQD staff member Sebastian Kallumkal detected definite and distinct solvent odors were emanating from Quala. During Sebastian's odor evaluation he observed the bay doors to Quala were open.

#### **Description**

Quala is located in central Macomb County. The surrounding area is densely populated with industrial and residential properties. The nearest residential properties are less than a tenth of a mile west of Quala. The facility is a synthetic minor opt-out for hazardous air pollutants (HAP) and volatile organic compounds (VOC).

At the facility, Quala cleans intermediate bulk containers (IBC), also called totes, used for paint storage. The totes range in size from 200 to 600 gallons. The tote cleaning process involves removing all components (valves, impellers, etc) from the tote, draining residual paint (heel) from the inside of the tote, rinsing the interior of each tote and the components with water and solvents at various pressures, re-assembling the tote, and cleaning the exterior of the tote by hand. The interior of each tote goes through four rinse stations. The cleaning solution for the first and second rinse station is collected and reused. The solvent for the third and final rinse is collected and used in the first and second rinse stations. The majority of containers are cleaned using a semi-continuous container cleaning process line (FGPROCESSLINE). The remainder of the containers are cleaned using an "offline" container cleaning process (FGOFFLINE). Valves, impellers, and other components are cleaned in separate wash cabinets (EUIPELLERWASH and EUVALVEWASH). The aforementioned processes are included in PTI 79-03C.

### **Inspection and Compliance Evaluation**

Ms. Courtney Durham, Environmental Manager, Quala, provided emissions and material usage records and safety data sheets (SDS) required in PTI 79-03C via email. The emissions calculation were initially provided on June 8, 2021, prior to the inspection. The 12-month rolling facility-wide emissions included in the calculations indicated Quala exceeded major source thresholds for both VOC and HAP for the 12-month rolling time period ending in May 2021. The reported 12-month rolling VOC and HAP emissions reported in May 2021 were 105.35 tons and 32.15 tons respectively. I spoke with Ms. Durham about the exceedances on June 8, 2021. During this call Ms. Durham and I identified that some of the cells used in the HAP emissions calculations contained incorrect data. Specifically, from January 2021 to May 2021, Ms. Durham accidentally used the auto-count feature in Microsoft Excel for HAP emissions from the solvent rinses for the process line (FGSOLVENTRINSE) and off line (FGOFFLINE). The solvents used in the tote rinses for these processes do not contain HAP and therefore were supposed to be zero. With respect to the VOC emissions, Ms. Durham indicated that the VOC emissions data from the rinses and exterior tote cleaning process were accurate but wasn't 100% sure about the heel waste data. She stated she wasn't sure she accurately interpreted the heel waste throughput data she received from the facility and would talk to the facility contact to see if she used the correct throughput. On June 10, 2021, I received an email from Ms. Durham stating that she worked extensively with the facility on June 9, 2021 and determined she was incorrect in her heel generation quantity previously reported. Updated emissions calculations were provided on June 10, 2021 and July 1, 2021. My compliance evaluation for the emission limits in PTI 79-03C is based on the emissions records provided on July 1, 2021.

### **Inspection**

I arrived at Quala at approximately 1:00 PM on June 10, 2021. Outside of the facility I observed the bay doors along Russell Schmidt were open to a height of about two feet. I did not detect solvent odors while standing in the facility parking or downwind on the day of the inspection. I entered the office, and introduced myself to Emily Zink, Customer Service Coordinator. I signed the visitor log book and Ms. Zink took my temperature. Ms. Zink introduced me to Mr. Jason Allemeier, VP of IBC Operations, Ms. Stacey Thom, Operations Manager, Mr. Marcus Maulding, and Mr. Joe Alvarez. I explained the purpose of my visit to the group. Mr. Maulding and Ms. Thom answered questions about facility operations/processes. They indicated that there are no boilers, emergency generators, or cold cleaners at the facility and there have been no changes to the process since PTI 79-03C was issued August 17, 2020. Mr. Maulding, Mr. Alvarez, and Ms. Thom showed me the processes and answered questions.

### **EUEXTERIOR**

EUEXTERIOR involves cleaning paint and sticker residue from the outside of the totes. VOC and HAP emissions are generated from the solvent (SP 3341) used to clean the exterior.

Quala is limited to 32.7 tons/year of VOC emissions and 9,000 gallons/year cleaning solvent usage for EUEXTERIOR (SC I.1 and II.1 respectively). Ms. Durham provided 12-month rolling VOC emissions and cleaning solvent usage records for EU-EXTERIOR, as required in EU-EXTERIOR SC VI.3, for January

2020 through May 2021 (Attachment 3). The records provided indicate the highest 12-month rolling VOC emission during the time period were 15.74 tons reported for the period ending January 2020. The highest 12-month rolling SP 3341 usage was 4,320 gallons reported for the period ending January 2020.

The permit requires Quala to capture all waste materials from the exterior cleaning process and to store them in closed containers (EUEXTERIOR SC III.1) and to handle all VOC or HAP containing materials in a manner to minimize generation of fugitive emissions (EUEXTERIOR SC III.2). Mr. Maulding showed me the exterior cleaning process. In this area I observed approximately 16 totes, a cart with a 5 gallon bucket containing the exterior cleaning solvent SP 3341 and cleaning rags, and two open containers, approximately 4 cubic feet in size, full of solvent laden rags. According to Mr. Maulding, employees fill the 5 gallon bucket from an approximately 300 gallon closed tote and inform him each time they fill the bucket for solvent usage tracking. Employees then dip rags into the 5 gallon bucket of solvent and wipe the exterior of the tote. The used, solvent laden rags, are then transferred to one of the 4 cubic feet open containers. Mr. Maulding and Ms. Thoms stated the rags remain in the open container to dry out and to drain any free solvent to the bottom. After drying and draining, the rags are transferred to the second 4 cubic feet open container to be disposed of. The second container was lined with a large plastic bag. I informed Mr. Maulding and Ms. Thoms that the permit requires waste from the exterior cleaning process be stored in closed containers. They stated they would have a lid made for the rag container. Quala appears to be in violation of EUEXTERIOR SC III.1 for not storing waste rags in closed containers, a notice of violation will be issued.

Quala is required to keep overhead doors located adjoining the tote cleaning process closed for half hour after tote cleaning operations are complete per SC III.3. I did not see any overhead doors adjoining the exterior cleaning process.

#### FGPROCESSLINE

FGPROCESSLINE consists of EULINEHEELING, EUIMPELLERWASH, EUVALVEWASH, EUFIRSTRINSE, EUSECONDRIINSE, EUTHIRDRIINSE, and EUFINALRIINSE. VOC emissions from this process are generated from the butyl cellosolve used to clean the totes and parts and from the removal of residual paint (heel) in totes. HAP emissions are generated from the heel removal process.

Quala is limited to 42.62 tons/year of VOC emissions (SC I.1). Ms. Durham provided 12-month rolling VOC emissions records for FGPROCESSLINE, as required in FG-PROCESSLINE SC VI.3, for January 2020 through May 2021 (Attachment 4). Quala is keeping 12-month rolling VOC emissions calculations generated from butyl cellosolve and heel waste individually, but not the combined VOC emissions for the flexible group. The records provided indicate Quala is using the emission factors stated in PTI 79-03C and the 12-month rolling VOC emissions from butyl cellosolve usage alone (EUIMPELLERWASH, EUVALVEWASH, EUFIRSTRINSE, EUSECONDRIINSE, EUTHIRDRIINSE, and EUFINALRIINSE) exceeded 42.62 tons/year each month from September 2020 to May 2021. This is a violation on FGPROCESSLINE SC I.1.

The permit contains limits of 50,000 gallons/year butyl cellosolve usage and 200,000 gallons heel waste collected for FG-PROCESSLINE (SC II.1 and SC II.2) respectively. Following the approval of PTI 79-03C, EGLE-AQD became aware that the butyl cellosolve and heel waste throughput limits in the permit were not correct. Specifically, using the througput limits and emission factors in the PTI for FGPROCESSLINE, the 42.62 ton/year VOC emission limit would be exceeded. It appears the butyl cellosolve and heel waste limits were inadvertantly carried over from the previous permit (PTI 79-03A). I informed the Quala represtatives of the error.

The permit also contains a limit of 25 totes processed per hour and 60,000 totes processed per year (FG-PROCESSLINE SC III.4). This limit was also from the previous permit and does not appear to correspond with VOC and HAP emission rates when using the emission factors in PTI 79-03C.

Compliance with the butyl cellosolve, heel waste, and totes processed limits were not evaluated because they do not correspond with the applicable VOC limits. The company is keeping records of this information as required in FG-PROCESSLINE SC VI.5, 6, and 7.

Mr. Maulding showed me the semi-continuous tote cleaning process during the inspection. I did not observe FG-PROCESSLINE being operated during the inspection.

PTI 79-03C requires Quala to capture all waste materials from the semi-continuous cleaning process and to store them in closed containers (EU-EXTERIOR SC III.2) and to handle all VOC or HAP containing materials in a manner to minimize generation of fugitive emissions (EU-EXTERIOR SC III.3). According to the permit, operations to minimize fugitive emissions shall include, but are not limited to, the following:

- a. Keeping containers covered at all times except when operator access is necessary.
- b. Installing and maintaining a level sensor on the heel waste collection system to ensure only liquid waste is being pumped from the storage trough into the storage tank.
- c. Installing and maintaining a properly operating control valve on the heel waste storage tank to minimize the venting of fugitive emissions.
- d. Inspecting the heel waste collection system, including level sensor and control valve, for proper operation on a daily basis and making repairs in a timely manner.
- e. Inspecting the container cleaning process line, including tanks and valves, for leaks on a daily basis and repairing leaks in a timely manner.
- f. Emptying the containment pit (secondary containment) for the container cleaner process line in a timely manner, not to exceed 24 hours.

Compliance with the inspections required in SC III.2 d) through f) is demonstrated through recordkeeping required in SC VI.8 and SC VI.9. According to Ms. Durham, daily inspections are conducted as required in SC III.2 d) through f), but the inspections are not documented on paper. This is a violation of FGPROCESSLINE SC VI.8 and SC VI.9.

Mr. Maulding showed me the heel waste station. Heel waste was not being collected while I was inspecting the process. According to Mr. Maulding, operations were over for the day.

At the heel waste station, an operator uses a squeegee to push the heel to the drain at the bottom of each tote. From the tote, the heel is collected in an open trough approximately one foot deep, one foot wide, and ten feet long. There is a drain hole at the west end of the trough. A hose with an electric pump is connected to the trough drain hole. The hose from the trough is directed to a 300 gallon waste collection tote. Another hose on the heel waste collection tote diverts air and vapors from the heel waste tote to a second tote with an approximately eight inch diameter opening on top that is covered with a lid with several holes through it. I did not see a control valve on the heel waste collection tote. Mr. Maulding stated that the heel waste collection tote does not have a control valve to minimize the venting of fugitive emissions.

During the inspection, there was heel about a half inch deep covering about a foot of the trough near the drain and the pump for the heel collection system was off. According to Mr. Maulding, the heel waste trough does not have a level sensor as required in the permit. Mr. Maulding stated that the operator manually turns off the pump when there is no liquid in the trough, he was not aware the permit required a level sensor. Mr. Maulding and Mr. Allemeier said they would have a level sensor installed. Not having a control valve on the heel waste collection tote and a level sensor on the heel waste trough is a violation of FG-PROCESSLINE SC III.3.

The 300 gallon tote containing heel waste collected on the day of the inspection had been moved to the 90 day waste holding area. The heel waste tote, identified by Mr. Maulding as being the tote filled on the day of the inspection, was almost full. There are graduated markings on the side of the heel waste tote indicating the volume in the tote. According to Mr. Maulding, the facility typically collects approximately 300 gallons of heel waste a day.

Adjacent to the heel waste station, I observed four wash cabinets used to clean lids, impellers, and valves. One of the cabinets was open and liquid was continuously flowing into the cabinet. The other cabinets were closed during the inspection. Mr. Maulding stated the open cabinet was used for lid cleaning and only contained water. Butyl cellosolve is used in the closed cabinets. I informed Mr. Maulding that if they begin using VOC or HAP containing materials in the lid cleaning cabinet again, the lid should be closed when not in use.

Next to the area with the cabinets I observed an open "containment" pit. In the containment pit there was dark yellow and purple liquid (Attachment 5). Mr. Maulding estimated there was approximately 500 gallons of the liquid in the containment pit during the inspection. The liquid, according to Mr. Maulding, is waste butyl cellosolve and water from the first and second rinse tanks, waste water from another containment pit, and mop bucket water. The permit requires the containment pit be emptied in a timely manner, not to exceed 24 hours. According to Mr. Maulding, he has the pit emptied and the contents disposed of when the liquid level reaches about 4,000 - 5,000 gallons, not every day. I informed Mr. Maulding that Quala is required to collect waste and store it in closed containers and empty the pit in a timely manner. Mr. Maulding indicating he will stop emptying waste into the containment pit and will instead put it directly into closed containers. Storing waste from the first and second rinse tanks in the open containment pit is a violation of FG-PROCESSLINE SC III.2 and SC III.3.

After the heel station, the tote drain cap is put back on and totes are moved along rollers manually to the rinse stations. Prior to the first rinse the tote drain cap is removed and residual heel is collected in an open trough.

Next the totes are moved to the first rinse station. There are four rinse stations total on the line, each with three spray heads. Quala uses a mixture of butyl cellosolve and water in the first and second rinses, and 100% butyl cellosolve in the third and fourth rinse. At the rinse stations, spray heads are attached to the top of each tote and the pressurized cleaning solutions are sprayed into the totes at pressures between 235 psi and 1800 psi. The rinse solutions continuously drain from the bottom of each tote during the rinse cycle. As the liquids drain, they are collected in an open trough with a sump drain located a couple inches from the bottom of the trough. Metal panels and vinyl curtains were in place along the length of the trough during the inspection. The panels and curtains minimize fugitive emissions and splashing from this process. Heavies/sludge accumulate below the sump drain and the remaining cleaning solution is returned to a holding tank for reuse. At the end of each day, Quala collects the heavies/sludge in waste containers for disposal. The recovered rinse solution is run through a fabric filter before being returned to the holding tanks. The holding tanks were uncovered when I arrived at the station. Mr. Maulding stated he had the lids removed prior to the inspection because he thought I may want to see inside the tanks. I informed Mr. Maulding the permit requires the tanks to be covered at all times except during operator access. Mr. Maulding put the covers back on the tank while I was present.

The permit requires verification of the butyl cellosolve emission factor from FG-PROCESSLINE to be conducted within 2 years of permit issuance. PTI 79-03C was approved August 17, 2020, approximately 10 months prior to this inspection. Quala has not yet conducted testing to verify the butyl cellosolve emission factor from FG-PROCESSLINE.

Quala is required to keep overhead doors located adjoining the tote cleaning process closed while cleaning totes and for half hour after tote cleaning operations are complete per SC III.3. The two overhead doors adjacent to FG-PROCESSLINE were open about 2 feet during the inspection, however, I did not see totes being processed on FG-PROCESSLINE while the doors were open.

#### FG-OFFLINE

The offline tote cleaning process includes tote disassembly, heel removal, and two rinses using one spray head. The solvent used in the first rinse is butyl cellosolve. n-butyl acetate is used in the second rinse. "SP-752 Isocyanate Cleaner" is used to clean tote lids in FGOFFLINE. n-butyl acetate appears to be a VOC because it is a carbon compound with a boiling point less than 250 C. In addition, the vapor pressure of n-butyl acetate is a range where it can be expected to be emitted. Based on the SDS for SP 752 (Attachment 6), the product contains 100% VOC by weight, of which up to about 15% are HAP (<10% naphthalene and 1-5% ethylene glycol phenyl ether).

The permit requires the cleaning of totes and the handling of all VOC or HAP containing materials be done in a manner to minimize generation of fugitive emissions, including keeping containers covered at all times except when operator access is necessary (EU-OFFLINE SC III.1 and III.3 respectively). The permit also requires Quala to capture all waste materials from the offline cleaning process and to store them in closed containers (EU-EXTERIOR SC III.2).

At the offline heel waste station I observed a 55 gallon drum used for heel waste collection. No totes were being processed at the offline heel station during the inspection. The heel waste drum was uncovered and filled about two-thirds full with a translucent, off-white colored liquid. Mr. Maulding stated the liquid was isocyanate. I informed Mr. Maulding that the permit requires that the heel waste be stored in closed containers. Mr. Maulding installed the lid on the offline heel waste container while I was present. Following the inspection, Ms. Durham emailed me the SDS for the isocyanate (Tufcote Plus Isocyanate Activator manufactured by Axalta Coating Systems) in the waste drum (Attachment 7). Ms. Durham also stated in the email with the SDS that IBCs received with Tufcote Plus Isocyanate Activator are cleaned in the offline area because the Tufcote Plus Isocyanate Activator can be reactive. None of the chemical abstract service (CAS) registry numbers listed in the Tufcote Plus SDS are included in the EPA's list of HAPs.

I observed, at the offline second rinse station, the rinse head, butyl acetate tank, and lid cleaning station. No totes were being processed at the offline station during the inspection. The lid was installed on the butyl acetate tank. The lid cleaning tank was uncovered. I told Mr. Maulding to keep lids to tanks closed at all times except when operator access is necessary. Mr. Maulding closed the lid to the lid cleaning tank while I was present.

The permit contains a limit of 3 totes processed per hour based on a daily average and 4,000 totes processed per year at the offline cleaning station (FG-OFFLINE SC III.4). Ms. Durham provided records of the number of totes processed at FG-OFFLINE, as required in FG-OFFLINE SC VI.3, between January 2020 and May 2021. The records indicate the highest number of totes processed in a day were 3 and the highest 12-month rolling number of totes process were 2,090.

#### FGFACILITY

PTI 79-03C contains a facility-wide individual HAP limit of 9 tons/year (FGFACILITY SC I.1), an aggregate HAP limit of 22.5 tons/year (FGFACILITY SC I.2), and a VOC limit of 80 tons/year (FGFACILITY I.3) .

Ms. Durham provided monthly and 12-month rolling VOC and HAP emissions calculations for January 2020 through May 2021 (Attachment 8) and heel waste inventory for requested months in 2020 and 2021 (Attachment 9). The data in the heel waste inventory report supports the heel waste throughputs reported in the July 1, 2021 emissions records except for the month of August and September 2020. According to Ms. Durham, the data in the heel waste inventory included totes that were not heel waste and were therefore not counted as throughput in the emission report. Quala is using the HAP emissions factors in Appendix A of PTI 79-03C for process line heel waste emissions and the average percentage HAP listed in the SDS for EUEXTERIOR and EUOFFLINE. According to Ms. Durham, the facility was not tracking monthly SP 752, SP 3341, and n-butyl acetate emissions. As a result, Quala used the purchase records to calculate HAP and VOC emissions. I informed Ms. Durham Quala should be tracking the usage on a monthly basis going forward and using this information to calculate emissions.

The records provided indicate the highest 12-month rolling aggregate HAP emissions were 1.58 tons reported in May 2021. Using the highest HAP percentage listed in the SDS EUEXTERIOR (SP 3341) and EUOFFLINE (SP 752), instead of the average, the highest aggregate HAP emissions would be approximately 2.15 tons which is still less than the limits in FGFACILITY SC I.1 and I.2. I will tell Ms. Durham that the Quala should be using the highest percentage HAP listed in the SDSs to calculate emissions going forward.

The monthly and 12-month rolling VOC emissions calculations listed on the facility summary page provided do not include VOC emissions from EUEXTERIOR. The highest reported 12-month rolling VOC emissions on the facility summary page were 91.26 tons reported in May 2021. Adding the 12-month rolling VOC emissions from the EUEXTERIOR page for the period ending May 2021 (11.17 tons) to the 12-month rolling emissions reported in the facility summary page (91.26 tons), the highest 12-month rolling VOC emissions are 102.43 tons which exceeds the major source threshold for VOC. This is a violation of FGFACILITY SC I.3. R 336.1211(a)(ii) of the MAC requires sources directly emitting 100 tons per year or more of VOC obtain an ROP. R 336.1210 prohibits the operation of a source required to have an ROP except in compliance with all applicable terms and conditions of a ROP, unless a timely and administratively complete ROP application has been received. Per R 336.1210(4), for a stationary

source that is or becomes a major source, as defined by R 336.1211(1)(a)(i) to (iii), an administratively complete application shall be considered timely if it is received by the department not more than 12 months after the stationary source commences operation as a major source or otherwise becomes subject to the requirements to obtain a renewable operating permit as a major source.

**Michigan Air Emissions Reporting System (MAERS)**

Facility-wide VOC emissions reported for RY 2020 were 82.9 tons which is about 7 tons more than indicated in the records submitted July 1, 2021 for calendar year 2020. MAERS emissions were based on incorrect heel waste throughput values discussed earlier.

**Conclusion**

Based on information gathered and reviewed for this inspection, VOC emissions from the facility were greater than 100 tpy for the period ending May 2021. In addition, Quala appears to be in violation of the following conditions in PTI 79-03C: EU-EXTERIOR SC III.1, FG-PROCESSLINE SC I.1, SC III.2 and SC III.3, SC VI.8, SC VI.9 and FGFACILITY SC I.3. A notice of violation will be issued.

NAME K. KellyDATE 07/13/21SUPERVISOR Joyce