

MACT WORK PRACTICE PLAN APPENDIX  
 Part (a), Section 1: Identifying Organic HAP Materials  
 Lansing Grand River

Part (a), Section 1, must be completed and/or reviewed at least once per Title V deviation reporting period (e.g., semi-annually, quarterly) and retained as a record to document compliance with the regulation.

**STEPS TO COMPLETING PART (a), Section 1:**

- 1) Evaluate materials for presence of organic HAPs. The evaluation must include all paints, solvents, adhesives, sealers, and coating operation cleaning materials (e.g., booth cleaners, grate cleaners).  
 (e.g. to perform the evaluation, site can use SDS and GMR2 as resources)
- 2) Record the GM ID number, the product name, and the application category in the space provided. It is recommended to include the HAP content and any other pertinent information in the Comment column.
- 3) Complete "Review Completed By" and "Review Date" sections at bottom of page.

No.	HAP Material (GM Product ID#)	HAP Material Product Name	Application Category	Comment
	30098817	10221 GageThin MIBK	Thinners/Reducers; Cleaning Agents	Paint - Paint Mix, BASF Lab, Spot Repair, QA/QC for ELPO
	30098169	31947 Purge Solvent	Thinners/Reducers; Cleaning Agents	Paint - Mix Room, Booths, Repair
	1181691	35250 Reducer Fast (BASF)	Thinners/Reducers	Paint - Repair
	30093336	38183 Equipment Cleaner	Cleaning Agents	Paint - Mix Room, Booths, Repair, Foam Storage
	1185435	3M Adhesion Promoter 4298UV	Cleaning Agents	LOC - Striping
	333008	Acrysol High Performance Body Solvent	Cleaning Agents	Paint - Various LOC - Striping GA - Various
	356321	Aromatic 100	Thinners/Reducers; Cleaning Agents	Paint - Mix Room, Various

No.	HAP Material (GM Product ID#)	HAP Material Product Name	Application Category	Comment
	143727	Aromatic 150 solvent (i.e. Cyclosol 63)	Thinners/Reducers; Cleaning Agents	Paint - Mix Room
	341279	Betafoam 89100N Foam Prepolymer	Deadener / Foam	Paint - Foam Application, Foam Storage
	2706543	E10CG197 2K4 Component A	Clear Coat Final Repair	Paint - Mix Room, Booth, Spot Repair; GA - Final Repair
	40001879	E10CG081G 2K-4 Component A	Clear Coat Final Repair	Paint - Mix Room, Booth, Spot Repair; GA - Final Repair
	40007388	N52CT081M 2K4 Comp 'B'	Clear Coat Final Repair	Paint - Mix Room, Booth, Spot Repair; GA - Final Repair
	40017309	E10RG034G Cherry Pop CC	Clear Coat Final Repair	Paint - Mix Room, Booth, Spot Repair; GA - Final Repair
	349711	Froth-Pak 12 ISO	Deadener / Foam	Paint - Foam Application, Storage
	351707	71553 GageSol Paint Stripper	Cleaning Agents	Paint - CC and Prime Booth, Chemical Pump Room
	348457 / 234453	High Tech Clear Pump Grade Clear Seam Sealer P10567	Sealer / Adhesive	Paint - 0' GA
	234453	High Tech Clear Seam Sealer Clear Transparent P10195	Sealer / Adhesive	Paint - Foam Storage
	318396	High Tech Clear Seam Sealer Clear Transparent P10200	Sealer / Adhesive	Paint - Spot Repair, Foam
	40015579	Kent Leak Check Water Leak Sealer P50087	Sealer / Adhesive	GA - End of Line Repair
	1180845	Loctite 565 Low Strength Thread Sealant	Sealer / Adhesive	GA - Trim
	102576	Methyl Isobutyl Ketone (MIBK)	Primer Surfacer ELPO	Paint - BASF Lab, Spot Repair, QA/QC for ELPO
	30099514	Naphtha Vmp Rule 66	Cleaning Agents	Paint and GA
	40000262	71567 GageSol Cobra Post Flush	Cleaning Agents	Paint - Mix Room; Paint Booth (Line Cleaner - not always physically present onsite)

No.	HAP Material (GM Product ID#)	HAP Material Product Name	Application Category	Comment
	30086725	S-600 Cobra Solvent Line Cleaner	Cleaning Agents	Paint - Mix Room; Paint Booth (Line Cleaner - not always physically present onsite)
	30086722	S-601 Cobra Paint Line Pre-cleaner	Cleaning Agents	Paint - Mix Room; Paint Booth (Line Cleaner - not always physically present onsite)
	339333	71900 GageSol Coating	Primer Surfacer; Base Coat; Clear Coat	Paint - Booths, Chemical Pump Room
	30086720	71610 GageSol Hydra	Cleaning Agents	Paint - Mix Room, Line Cleaner
	40010375	U28AW110 WA225A Generic Gray Primer	Primer Surfacer Final Repair	Paint - Mix Room, Booth, Spot Repair; GA - Final Repair
	2052182	U28WW786 Abalone W Primer	Final Repair	Paint - Mix Room, Booth, Spot Repair GA - Final Repair
	30100836	UBR 200 Univ Blending Solvent	Thinners/Reducers	Paint and GA Repair
	1182362	VP126 Flash Fill UV Primer Surfacer	Final Repair	GA - Final Repair

#### Wastes

No.	HAP Material (GM Product ID#)	HAP Material Product Name	Application Category	Comment
	N/A	Waste Paints and Thinners	Thinners/Reducers	Assume HAP content due to raw materials used
	N/A	Reclaimed Purge Thinner	Thinners/Reducers	Assume HAP content due to raw materials used

#### Diamont Repair and Touch Up Paints (quarts cans not exempt)

No.	HAP Material (GM Product ID#)	HAP Material Product Name	Application Category	Comment
	352007	WA8555 Black Diamont	Final Repair	Paint - Spot Repair GA - Final Repair
	30102662	Diamont Caught Red Handed Step 1 WA132X (1270043200)	Final Repair	Paint - Spot Repair GA - Final Repair

No.	HAP Material (GM Product ID#)	HAP Material Product Name	Application Category	Comment
	30102663	Diamont Caught Red Handed Step 2 WA132X (1270043481)	Final Repair	Paint - Spot Repair GA - Final Repair
	30106803	WA140X Abalone White Diamont MC Step 2	Final Repair	Paint - Spot Repair GA - Final Repair
	30106805	WA140X Abalone White Diamont GC Step 1	Final Repair	Paint - Spot Repair GA - Final Repair
	30111848	WA8624 Summit White Diamont	Final Repair	Paint - Spot Repair GA - Final Repair
	40019450	WA252F Cherry Pop Diamont	Final Repair	Paint - Spot Repair GA - Final Repair
	40010265	Dark Shadow WA626D Diamont	Final Repair	Paint - Spot Repair GA - Final Repair
	40010091	Diamont Oconus	Final Repair	Paint - Spot Repair GA - Final Repair
	40010298	Diamont Shock	Final Repair	Paint - Spot Repair GA - Final Repair
	40019497	WA249F Rift Diamont	Final Repair	Paint - Spot Repair GA - Final Repair
	40005191	WA413C Crush Diamont	Final Repair	Paint - Spot Repair GA - Final Repair
	40015529	WA328E Rowan Met Diamont	Final Repair	Paint - Spot Repair GA - Final Repair
	40015530	WA328E Darkmoon Blue Diamont	Final Repair	Paint - Spot Repair GA - Final Repair
	40005195	WA464 Satin Steel Diamont	Final Repair	Paint - Spot Repair GA - Final Repair
	40022696	WA619 Cypress Met Diamont	Final Repair	Paint - Spot Repair GA - Final Repair
	40022687	WA626G Vivid Diamont	Final Repair	Paint - Spot Repair GA - Final Repair
	40033695	WA626 Rapid Diamont	Final Repair	Paint - Spot Repair GA - Final Repair

No.	HAP Material (GM Product ID#)	HAP Material Product Name	Application Category	Comment
-----	-------------------------------	---------------------------	----------------------	---------

**Note 1** The organic HAP content of the materials listed above were obtained from SDS information using 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens (and suspected carcinogens), as specified in 29 CFR 1910.1200(d)(4) [as listed as known carcinogen by NTP, IARC or OSHA] and at 1.0 percent by mass or more for other organic HAP compounds.

MACT WORK PRACTICE PLAN APPENDIX  
 Part (b): Storage, Mixing, and Conveying HAP Materials  
 Lansing Grand River

Part (b) must be completed at least once per Title V deviation reporting period (e.g., semi-annually, quarterly) and retained as a record to document compliance with the regulation.

ITEM # b.1 40 CFR §63.3094 (b)(1)	<b>TOPIC: Storing HAP materials.</b>  <b>ACTIONS:</b> 1. Conduct a visual inspection of each HAP material storage area identified in "Part (a), Section 2." 2. Confirm that containers are kept closed when not in use. 3. Replace cover if any are found open and note occurrence(s) in the "Comments/Validation" column. 4. Communicate proper storage procedures, as appropriate. 5. Enter inspection date for each HAP category in box under appropriate inspection period. <b>NOTE: If corrective action is required to address a plan nonconformance, provide detail of the action in the "Comments/Validation" column and validate effectiveness. Include dates of all related follow up inspections.</b>					
	HAP Material Category	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/Validation
	Seal./Adh.--Body Shop					
	ELPO					
	Seal./Adh.--Paint Shop					
	Deadener					
	Primer Surfacer					
	Base Coat					
	Clear Coat					
	Windshield Installation					
	Final Repair					
	Thinners/Reducers					
	Cleaning Agents					

ITEM # b.2 40 CFR §63.3094 (b)(2)	<b>TOPIC: Minimizing HAP material spills.</b>  <b>ACTIONS:</b> 1. Conduct a visual inspection of each HAP material storage area identified in "Part (a), Section 2." 2. Confirm that HAP materials are stored according to WPP. 3. Enter inspection date for each HAP category in box under appropriate inspection period. <b>NOTE: If corrective action is required to address a plan nonconformance, provide detail of the action in the "Comments/Validation" column and validate effectiveness. Include dates of all related follow up inspections.</b>					
	HAP Material Category	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/Validation

Seal./Adh.--Body Shop					
ELPO					
Seal./Adh.--Paint Shop					
Deadener					
Primer Surfacer					
Base Coat					
Clear Coat					
Windshield Installation					
Final Repair					
Thinners/Reducers					
Cleaning Agents					

ITEM # b.3 40 CFR §63.3094 (b)(3)	<p><b>TOPIC: HAP material conveyance.</b></p> <p><b>ACTIONS:</b></p> <ol style="list-style-type: none"> <li>1. Confirm that HAP materials are conveyed according to WPP.</li> <li>2. List any conveyance system failures in the "Comments / System Failure Details" column adjacent to the applicable HAP material category. If there were no failures in the applicable inspection period, please indicate "none."</li> <li>3. Enter review date for each HAP category in box under appropriate inspection period.</li> </ol>					
	<b>HAP Material Category</b>	<b>ENTER INSPECTION DATE BELOW:</b>	<b>ENTER INSPECTION DATE BELOW:</b>	<b>ENTER INSPECTION DATE BELOW:</b>	<b>ENTER INSPECTION DATE BELOW:</b>	<b>Comments / System Failure Details</b> <i>(i.e., date, nature of failure, corrective action)</i>
	Seal./Adh.--Body Shop					
	ELPO					
	Seal./Adh.--Paint Shop					
	Deadener					
	Primer Surfacer					
	Base Coat					
	Clear Coat					
	Windshield Installation					
	Final Repair					
	Thinners/Reducers					
Cleaning Agents						

ITEM # b.4 40 CFR §63.3094 (b)(4)	<p><b>TOPIC: Keeping mixing vessels closed, unless adding or removing material.</b></p> <p><b>ACTIONS:</b></p> <ol style="list-style-type: none"> <li>1. Conduct a visual inspection of each HAP material mixing area identified in "Part (a), Section 2."</li> <li>2. Confirm that vessels are kept closed, unless adding or removing material.</li> <li>3. Close vessel if any are found open and note occurrence(s) in the "Comments/Validation" column.</li> <li>4. Re-instruct employees regarding proper mixing vessel procedures, as appropriate.</li> <li>5. Enter inspection date for each HAP category in box under appropriate inspection period.</li> </ol> <p><b>NOTE: If corrective action is required to address a plan nonconformance, provide detail of the action in the "Comments/Validation" column and validate effectiveness. Include dates of all related</b></p>					

follow up inspections.					
HAP Material Location	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/Validation
Main Mix Room					
Satellite Mix Room					
Other					

**TOPIC:** Minimizing HAP emissions during cleaning of storage, mixing, and conveying equipment.

**ACTIONS:**

1. Conduct a visual inspection of a cleaning activity for a HAP material storage container, mixing and conveying equipment .
2. Confirm that HAP emissions were minimized during the cleaning process.
3. If no such cleaning activities took place during the applicable inspection period, please enter "none" in the "Comments/Validation" column.
4. Re-instruct employees regarding proper cleaning procedures, as appropriate.
5. Enter inspection date for each HAP category in box under appropriate inspection period.

**NOTE:** If corrective action is required to address a plan nonconformance, provide detail of the action in the "Comments/Validation" column and validate effectiveness. Include dates of all related follow up inspections.

ITEM # b.5  
40 CFR  
§63.3094  
(b)(5)

HAP Material Category	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/Validation
Seal./Adh.--Body Shop					
ELPO					
Seal./Adh.--Paint Shop					
Deadener					
Primer Surfacer					
Base Coat					
Clear Coat					
Windshield Installation					
Final Repair					
Thinners/Reducers					
Cleaning Agents					

**Inspection Completed By:**  
**Inspection Date:**



MACT WORK PRACTICE PLAN APPENDIX  
 Part (a), Section 2: Identifying HAP Material Locations  
 Lansing Grand River

Part (a), Section 2, must be completed and/or reviewed at least once per Title V deviation reporting period (e.g., semi-annually, quarterly) and retained as a record to document compliance with the regulation.

**STEPS TO COMPLETING PART (a), Section 2:**

- 1) Identify the "building" and "bay locations" where storing, mixing, and conveying of HAP materials takes place (used in and waste materials generated by), and record in the space provided. Group into categories by common material identifiers and handling methods.
- 2) Identify the "conveyance method" for each HAP material category, and record in the space provided. (Note: The "Conveyance Method" column has a "drop down menu" of choices.)
- 3) Identify the process owner job position for each HAP material, and record in the space provided.

HAP Material Category	Building	Column / Location	Conveyance Method 40 CFR §63.3094 (b)(3)	Process Owner	Comment
<b>1 Primer Surfacer - See Sec 1 Tab for List</b>					
Storing	Paint	A28 (0' Level)	Not Applicable	Group Leader	Tote Storage Area
Mixing	Paint	A24-A26(0' Level)	Not Applicable	Group Leader	Paint Mix Room
Conveying	Paint	B19-B21 (23' Level)	Pumps, hard piping	Group Leader	Paint Booths
<b>2 Topcoat (Basecoat &amp; Clearcoat) - See Sec 1 Tab for List</b>					
Storing	Paint	A28 (0' Level)	Not Applicable	Group Leader	Tote Storage Area Quarts in Flam Cabinet
Mixing	Paint	A24-A26 (0' Level)	Not Applicable	Group Leader	Paint Mix Room
Conveying	Paint	D19-D21 (23' Level)	Pumps, hard piping	Group Leader	Paint Booth
<b>3 Repair (Prime / Moist Sand) - See Sec 1 Tab for List</b>					
Storing	Paint	BASF Lab & A27 (0' Level)	Not Applicable	Group Leader	Paint Mix Room / BASF Lab
Mixing	Paint	BASF Lab & A27 (0' Level)	Not Applicable	Group Leader	May add MIBK
Conveying	Paint	Column E28 (23') Moist Sand Repair	Other--	Group Leader	Tack off Area
<b>4 Repair (Spot) - See Sec 1 Tab for List</b>					
Storing	Paint	C8 (23' Level) B11 (23' Level) A.6-8 (7' Level) D24 (0' Level)	Not Applicable	Group Leader	Spot Repair Mix Kitchen Flammable Storage Cabinet
Mixing	Paint	C8 (23' Level)	Not Applicable	Group Leader	Spot Repair Mix Kitchen
Conveying	Paint	B8 & C8 (23' Level)	Other--	Group Leader	Spot Repair Booths
<b>5 Repair (Final) - See Sec 1 Tab for List</b>					
Storing	GA	E2	Not Applicable	Group Leader	Final Repair Mix Kitchen
Mixing	GA	E2	Not Applicable	Group Leader	Final Repair Mix Kitchen
Conveying	GA	E3	Other--	Group Leader	Final Repair Booths
<b>6 Deadener / Foam - See Sec 1 Tab for List</b>					
Storing	Paint	A.1-7 (7' Level)	Not Applicable	Group Leader	Foam Tote Storage
Mixing	Paint	A.1-9 (23' Level)	Not Applicable	Group Leader	Foam Tanks/Piping

HAP Material Category	Building	Column / Location	Conveyance Method 40 CFR §63.3094 (b)(3)	Process Owner	Comment
Conveying	Paint	A.1-9 (23' Level)	Other--	Group Leader	Foam Tanks/Piping
<b>7 Sealer / Adhesive - See Sec 1 Tab for List</b>					
Storing	GA Paint	E5, F9, A.4-10.5 (7'), D24 (0')	Not Applicable	Group Leader	Water Test Seam Sealer - Flammable Cabinet Foam/Deadener
Mixing	N/A	N/A	Not Applicable	Group Leader	
Conveying	GA Paint	E5 A.1-9 (7' Level)	Other--	Group Leader	Water Test Seam Sealer Foam/Deadener
<b>8 Purge Solvent - Gage 31947</b>					
Storing	Paint	0' Level A24-A28	Not Applicable	Group Leader	Totes in mix room
Mixing	Paint	0' Level A24-A26	Not Applicable	Group Leader	Mix room
Conveying	Paint	D19-D21, B.5-19 (23')	Pumps, hard piping	Group Leader	
Conveying	Varies - See Partswasher List		Other--	Group Leader	See Partswasher Master List
<b>9 Other Thinners / Reducers - See Sec 1 Tab for List</b>					
Storing	Paint	BASF Lab & A27 (0' Level)	Not Applicable	Group Leader	
Storing	Paint	C8 (23' Level)	Not Applicable	Group Leader	
Storing	GA	E2	Not Applicable	Group Leader	
Mixing	Paint	BASF Lab & A27 (0' Level)	Not Applicable	Group Leader	
Mixing	Paint	B8 & C8 (23' Level)	Not Applicable	Group Leader	
Mixing	GA	E2	Not Applicable	Group Leader	
Conveying	Paint	C8 (23' Level)	Other--	Group Leader	Spot Repair Booths
Conveying	GA	E3	Other--	Group Leader	Final Repair Booths
Conveying	Paint	B19-B21 (23' Level)	Pumps, hard piping	Group Leader	The Aromatic 100 & 150 products are used to thin production primer sprayed in prime booth
<b>10 Cleaning Agents - See Sec 1 Tab for List</b>					
Storing	GA	Column F14 Column E5	Not Applicable	Group Leader	Glass Install/Glass Repair - Flammable Cabinet
Storing	Paint	C8 (23')	Not Applicable	Group Leader	Spot Repair
Storing	Paint	E19 (23' Level)	Not Applicable	Group Leader	Flammable cabinet
Storing	Paint	A27 (0' Level)	Not Applicable	Group Leader	Paint Mix Room
Storing	Paint	CC21 & C23 (23') D24 (0' Level) A.4 10.5 (7' Level)	Not Applicable	Group Leader	Flammable Cabinet
Storing	Paint	A24-A28 (0' Level)	Not Applicable	Group Leader	Paint Mix/Storage Room
Storing	Paint	D19-D21 (23' Level)	Not Applicable	Group Leader	
Storing	Varies - See Partswasher List		Not Applicable	Group Leader	See Partswasher Master List
Mixing	N/A	N/A	Not Applicable	N/A	
Conveying	Paint	E20 (23' Level)	Solvent wipes	Group Leader	
Conveying	GA	Column F14 Column E5	Other--	Group Leader	Glass Install/Glass Repair
Conveying	Varies - See Partswasher List		Other--	Group Leader	See Partswasher Master List
Conveying	Paint	D19-D21 (23')	Pumps, hard piping	Group Leader	Paint Booth

**Review Completed By:**  
**Review Date:**

MACT WORK PRACTICE PLAN APPENDIX  
 Part (c): Cleaning and Purging of Coating Equipment  
 Lansing Grand River

The Work Practice Plan must be reviewed against Part (c) at least once per Title V deviation reporting period (e.g., semi-annually, quarterly). The Work Practice Plan review must be retained as a record to document compliance with the regulation.

<b>STEPS TO COMPLETING PART (c):</b>	
1)	Evaluate site practices for ITEMS # c.1.i through c.1.viii are properly identified in Work Practice Plan
2)	At least one method for minimizing HAP emissions must be identified for each ITEM in the WPP.
	Note: The checklist for "Part b.5" validates how emissions are minimized during the cleaning of mixing and conveying equipment.

ITEM # c.1.i 40 CFR §63.3094 (c)(1)(i)	<b>Vehicle body wipe</b>
	Use of solvent-moistened wipes
	Keeping solvent containers closed when not in use
	Keeping wipe disposal/recovery containers closed when not in use
	Use of tack-wipes
	Use of solvents containing <1% HAP by weight
ITEM # c.1.ii 40 CFR §63.3094 (c)(1)(ii)	<b>Coating line purging emissions</b>
	Air/solvent push-out
	Capture/reclaim or recovery of purge mat'ls
	Block painting to maximum feasible amount
	Use of low-HAP or no-HAP solvents
ITEM # c.1.iii 40 CFR §63.3094 (c)(1)(iii)	<b>Flushing of coating systems (system clean out)</b>
	Keeping solvent tanks closed
	Recovering and recycling solvents
	Keeping recovered/recycled solvent tanks closed
	Use of low-HAP or no-HAP solvents
ITEM # c.1.iv 40 CFR §63.3094 (c)(1)(iv)	<b>Cleaning of spray booth grates</b>
	Controlled burn off
	Rinsing with high pressure water
	Use of spray on masking or other liquid masking
	Use of low-HAP or no-HAP cleaners
ITEM # c.1.v 40 CFR §63.3094 (c)(1)(v)	<b>Cleaning of spray booth walls</b>
	Use of masking materials (paper, plastic, etc.)
	Use of spray on masking
	Use of rags and manual wipes instead of spray application
	Use of low-HAP or no-HAP cleaners
	Controlled access to cleaning solvents
ITEM # c.1.vi 40 CFR §63.3094 (c)(1)(vi)	<b>Cleaning of spray booth equipment (robots, hoses, etc.)</b>
	Use of covers on equipment
	Use of parts cleaners (off-line submersion cleaning)
	Use of spray on masking or other protective coatings
	Use of low-HAP or no-HAP cleaners
	Controlled access to cleaning solvents
ITEM # c.1.vii 40 CFR §63.3094 (c)(1)(vii)	<b>Cleaning of external spray booth areas</b>
	Use of removable floor coverings
	Use of manual and/or mechanical scrubbers, rags, or wipes instead of spray application
	Use of shoe cleaners to eliminate coating track-out from booths
	Use of booties or shoe wraps
	Use of low-HAP or no-HAP cleaners
	Controlled access to cleaning solvents
ITEM # c.1.viii 40 CFR §63.3094 (c)(1)(viii)	<b>Housekeeping measures not addressed above</b>
	Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, etc) in covered containers when not in use
	Storing new and used solvents in closed containers
	Transferring of solvents in a manner to minimize the risk of spills

<b>Review Completed By:</b> <b>Review Date:</b>
--