

GM *FLINT ASSEMBLY & FLINT METAL CENTER*

Work Practice Plan for the Minimization of Organic HAP Emissions

Pursuant to Paragraph 63.3094 of NESHAP Subpart III, General Motors' *FLINT ASSEMBLY* facility has developed a work practice plan to minimize organic Hazardous Air Pollutant (HAP) emissions from the following activities:

1. The storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which emission limits are established under §63.3090(a) through (d) or §63.3091(a) through (d). These coating operations include ELPO, primer surfacer, topcoat, final repair, glass bonding adhesive operations, sealers and adhesives, and deadener.
2. The cleaning and the purging of equipment associated with all coating operations for which emission limits are established under §63.3090(a) through (d) or §63.3091(a) through (d).

The plan details are identified in the following paragraphs. **Blue font** indicates site-specific information.

I) Identify HAP containing materials subject to the work plan requirements.

In order to identify the HAP containing coatings, thinners, and cleaning materials, *FLINT ASSEMBLY & FLINT METAL CENTER* reviewed the formulation data contained on supplier Safety Data Sheets or requested HAP content from suppliers. Once the list of HAP containing materials is developed, *FLINT ASSEMBLY & FLINT METAL CENTER* will review plant operations to identify where the materials are stored, mixed, conveyed, and / or used as equipment cleaning or purging solvents.

The materials, location, and uses are summarized in the MACT Work Practice Plan Appendix.

II) Implement work practices to minimize HAP emissions from the storage, mixing, and conveying of coatings, thinners, cleaning materials, and waste materials as identified in Paragraph I.

A. Storage Work Practice (63.3094(b) (1))

All organic-HAP-containing coatings, thinners, cleaning materials, and waste materials will be received and stored in closed containers.

Not applicable to FLINT METAL CENTER since it does not use organic-HAP-containing coatings, thinners or cleaning materials.

B. Spill Prevention Work Practice (63.3094(b) (2))

The risk of spills of organic-HAP-containing coatings, thinners, cleaning materials, and waste materials will be minimized.

The following practices will be utilized to minimize the risk of spills:

1. Materials will be stored indoors in designated areas to the extent practicable to minimize the risk of container puncture during storage or handling. Example areas are as follows:
 - a. Low traffic areas
 - b. Paint mix room
 - c. Walled areas
 - d. Flammable cabinets
 - e. Storage tanks
2. Materials will, to the extent practicable, be stored indoors in areas with containment, curbing, and / or sloped floors.
3. Storage tanks will be equipped with high level alarms to prevent overfilling.
4. Load / unload activities will be monitored by a GM representative and will be stopped immediately should material be leaked or spilled. The environmental response plan will be initiated to quickly clean up the leak or spill.
5. Material handling and transfer operations will be conducted according to specific work plans developed for the function or in accordance with good engineering practices.
6. Employees will be trained pursuant to the Resource Conservation and Recovery Act, as appropriate.

Not applicable to FLINT METAL CENTER since it does not use organic-HAP-containing coatings, thinners or cleaning materials.

C. Material Conveyance (63.3094(b) (3))

Organic-HAP-containing coatings, thinners, and cleaning materials will be conveyed from one location to another in closed containers or pipes.

Materials are conveyed in pipes for the following activities:

1. Delivery of clearcoat paint from the paint recirculation systems to the clearcoat paint booths.
2. Delivery of purge solvent from the paint mix room to the paint booths.
3. Recovery of the purge solvent to the reclaimed purge solvent tank.
4. Delivery of equipment cleaning solvents to the booths (LINE CLEANER).

Materials that are not conveyed in pipes will be transferred in closed containers.

Not applicable to FLINT METAL CENTER since it does not use organic-HAP-containing coatings, thinners or cleaning materials.

D. Mixing vessels (63.3094(b) (4))

Mixing vessels, other than day tanks equipped with continuous agitation systems, which contain organic-HAP-containing coatings and other materials will be closed except when adding to, removing, or mixing the contents.

Not applicable to FLINT METAL CENTER since it does not use organic-HAP-containing coatings, thinners or cleaning materials.

E. Cleaning of storage, mixing and conveying equipment (63.3094(b) (5))

The requirement for the plan to minimize organic HAP emissions during the cleaning of storage, mixing, and conveying equipment is satisfied by the implementation of some or all of the activities listed below and *FLINT ASSEMBLY* will implement one or more of these as appropriate for *FLINT ASSEMBLY*, taking into consideration the particular operation and the particular activities involved.

Examples of practices which will be considered:

1. Use of cleanup materials that eliminate or minimize the amount of organic HAP in the material.
2. Use of closed loop, recirculating cleaning practices.
3. Minimizing to the extent possible the amount of organic HAP containing material.
4. Manage materials in closed containers.

Not applicable to FLINT METAL CENTER since it does not use organic-HAP-containing coatings, thinners or cleaning materials.

III) Implement work practices to minimize organic HAP (OHAP) emissions from cleaning and from purging of equipment associated with all coating operations for which emission limits are established under §63.3090(a) through (d) or §63.3091(a) through (d).

A. Vehicle body wipe emissions (63.3094 (c)(1)(i))

FLINT ASSEMBLY will use one or more of the following techniques for minimizing organic HAP emissions for vehicle body wipe processes.

1. Use of solvent-moistened wipes.
2. Keeping solvent containers closed when not in use.
3. Keeping wipe disposal/recovery containers closed when not in use.
4. Use of tack-wipes.
5. Use of solvent **wipes** containing less than 1 % OHAP by weight.

The following table identifies the body wiping operations and the technique(s) in use.

Operation	Location	Technique
Sealer cleanup	Paint Shop Sealer Deck	#1, #3, and #5
Body Wiping	Paint Shop	#1, #3, and #5
Body Shop highlight wipes	Body Shop	#1, #3, and #5
Urethane cleanup	Windshield Install	#1, #3, and #5

Not applicable to FLINT METAL CENTER since it does not use organic-HAP-containing coatings, thinners or cleaning materials.

B. Coating line purging emissions (63.3094 (c)(1)(ii))

FLINT ASSEMBLY will use one or more of the following for minimizing organic HAP emissions from coating line purging processes:

1. Air/solvent push-out.
2. Capture and reclaim or recovery of purge materials (excluding applicator nozzles/tips).
3. Block painting to the maximum extent feasible.
4. Use of low-HAP or no-HAP solvents for purge.

The following table identifies the purging operations and the technique(s) in use.

Operation	Location	Technique
Clearcoat	Paint Shop	#1 and #2

Not applicable to FLINT METAL CENTER since it does not have a coating line purge process.

C. Flushing of coating systems (63.3094 (c)(1)(iii))

FLINT ASSEMBLY will use one or more of the following for minimizing organic HAP emissions from the flushing of coating systems:

1. Keeping solvent tanks closed.
2. Recovering and recycling solvents.
3. Keeping recovered/recycled solvent tanks closed.
4. Use of low-HAP or no-HAP solvents

Operation	Location	Technique
Clearcoat	Paint Shop	#1, #2, and #3

Not applicable to FLINT METAL CENTER since it does not have a paint coating process subject to AutoMACT.

D. Cleaning of spray booth grates (63.3094 (c)(1)(iv))

FLINT ASSEMBLY will use one or more of the following for minimizing organic HAP emissions from the cleaning of spray booth grates:

1. Controlled burn-off.
2. Rinsing with high-pressure water (in place).
3. Rinsing with high-pressure water (off line).
4. Use of spray-on masking or other type of liquid masking.
5. Use of low-HAP or no-HAP content cleaners.

The following table identifies the spray booth and the technique(s) in use.

Operation	Location	Technique
Clearcoat booths	Paint Shop	#2, #4, and #5

Not applicable to *FLINT METAL CENTER* since it does not have a paint spray booth subject to AutoMACT.

E. Cleaning of spray booth walls (63.3094 (c)(1)(v))

FLINT ASSEMBLY will use one or more of the following for minimizing organic HAP emissions from the cleaning of spray booth walls:

1. Use of masking materials (contact paper, plastic sheet, or other similar type of material).
2. Use of spray-on masking.
3. Use of rags and manual wipes instead of spray application when cleaning walls.
4. Use of low-HAP or no-HAP content cleaners.
5. Controlled access to cleaning solvents.

The following table identifies the spray booth and the technique(s) in use:

Operation	Location	Technique
Clearcoat booths	Paint Shop	#1, #3, #4

Not applicable to *FLINT METAL CENTER* since it does not have a paint spray booth subject to AutoMACT.

F. Cleaning of spray booth equipment (63.3094 (c)(1)(vi))

FLINT ASSEMBLY will use one or more of the following for minimizing organic HAP emissions from the cleaning of spray booth equipment:

1. Use of covers on equipment (disposable or reusable).
2. Use of parts cleaners (off-line submersion cleaning).

3. Use of spray-on masking or other protective coatings.
4. Use of low-HAP or no-HAP content cleaners.
5. Controlled access to cleaning solvents.

The following table identifies the spray booth equipment and the technique(s) in use:

Operation	Location	Technique
Clearcoat booth robots and applicators	Paint Shop	#1 #2, and #3
Spot Repair booth applicators	Paint Shop	#2
Final Repair booth applicators	General Assembly	#2

Not applicable to FLINT METAL CENTER since it does not have a paint spray booth subject to AutoMACT.

G. Cleaning of external spray booth areas (63.3094 (c)(1)(vii))

FLINT ASSEMBLY will use one or more of the following for minimizing organic HAP emissions from the cleaning of spray booth areas:

1. Use of removable floor coverings (paper, foil, plastic, or similar type of material).
2. Use of manual and/or mechanical scrubbers, rags, or wipes instead of spray application.
3. Use of shoe cleaners to eliminate coating track-out from spray booths.
4. Use of booties or shoe wraps.
5. Use of low-HAP or no-HAP content cleaners.
6. Controlled access to cleaning solvents.

The following table identifies the area and the technique(s) in use:

Area	Location	Technique
External Spray Booth Areas	Paint Shop	#1, #2, #4
In Line repair paint mix room	Paint Shop	#1, #2
Final Repair	General Assembly	#2

Not applicable to FLINT METAL CENTER since it does not have a paint spray booth subject to AutoMACT.

H. Housekeeping measures not addressed elsewhere in the plan (63.3094 (c)(1)(viii))

FLINT ASSEMBLY will use one or more of the following for minimizing organic HAP emissions from housekeeping measures not addressed elsewhere in the plan:

1. Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, and similar items) in covered containers when not in use.
2. Storing new and used solvents in closed containers.
3. Transferring of solvents in a manner to minimize the risk of spills.

The following table identifies the area and the technique(s) in use-

Area	Location	Technique
Paint Mix Room – general cleaning	Paint Shop	#1, #2, and #3

Not applicable to *FLINT METAL CENTER* since it does not have a paint spray booth subject to AutoMACT.

IV. Plan Communication

The requirements of this work plan will be communicated to *FLINT ASSEMBLY & FLINT METAL CENTER* employees and contract employees as appropriate to ensure that the elements of the work plan are properly implemented.

Methods of communication include:

1. Task Instruction Sheets (or work instructions)
2. Hazardous materials communications
3. Team Meetings
4. Employee instruction
5. Work Plans

V. Inspection Requirements / Corrective Action

FLINT ASSEMBLY & FLINT METAL CENTER environmental engineers, or their designees, will perform inspections once per Title V deviation reporting period to ensure that the elements of the work plan are properly implemented. The “Work Practice Plan Appendix” will be used to document the inspections and resulting corrective actions, if applicable.

VI. Plan Updates

This work practice plan will be reviewed once during each Title V deviation reporting period (i.e. semi-annually) and updated as appropriate by the *FLINT*

ASSEMBLY and/or the FLINT METAL CENTER environmental engineer. You must document every review regardless of updates to the plan. Document your review in section XII.

VIII. Title V Permit (63.3094 (e))

This work practice plan is not incorporated into *FLINT ASSEMBLY'S & FLINT METAL CENTER'S* Title V permit. Revisions to the plan do not constitute revisions to *FLINT ASSEMBLY & FLINT METAL CENTER* Title V permit. Nonconformances to this work practice plan do not constitute Title V permit deviations.

IX. Plan Retention (63.3094 (f))

Copies of the current work practice plans, as well as plans developed within the preceding 5 years must be available on-site for inspection and copying by the permitting authority.

X. Definitions

Closed: A container is "closed" if its top, lid, hatch, or other opening mechanism is in the closed position. Containers requiring pumps or other devices inserted into the container are considered "closed" if the pump or other device is securely installed.

Storage: A container used for the storage of a HAP containing material is one in which no mixing or conveyance takes place. Examples may include totes, drums, and buckets.

HAP materials: refers to organic HAP-containing coatings, thinners, cleaning materials, and waste materials, as applicable pursuant to 40 CFR Part 63 Subpart IIII.

XI. Document Responsibilities

Environmental Engineer or Designee: Controls work practice plan document and conducts inspections and plan review.

Site Personnel: Utilizes appropriate work practices identified in the work practice plan and supports inspections and review.

XII. Plan Review

Document plan review below per Section VI:

Review Date:	Document Reviewer:	Revisions/Review Comments:
9-26-2018	A. Thibeault	Semi-annual review; Consolidated WPP between Flint Metal Center and Flint Assembly

MACT WORK PRACTICE PLAN APPENDIX

Part (a), Section 1: Identifying Organic HAP Materials

Flint Assembly & Flint Metal Center

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 HMCS#, 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.

	HAP Material FID/HMCS #	HAP Material Product Name	Application Category	Comment
Ex.	308041	i.e. Seam Sealer 10567	Seal/Adh--Paint Shop	1.5% toluene--used in high seal line.
19	40000280	E10RG025Z Glory Red CC	WB BC/Final Repair	
45	30114444	E10CG081G 2K4 COMP A	Clear Coat	
47	40007388	N52CT081M 2K4 Comp B	2K Clearcoat	< 0.2% Cumene
52	40003035	Diamont Bases and Colors	Final Repair	
53	1192725	N52CG132 CC Comp B - high bake	Final Repair	
55	346856	NP80 Non Isocyanate Primer NLR NP8022	Final Repair	
56	339110	U53CE0265 CC Repair Catalyst	Final Repair	
57	40000307	N52CU375 Lo Bak RP Comp-B	Final Repair	
58	30109277	833E1385 PR1385 Color Control Additive	Final Repair	
59	30113409	VP126 Flash Fill UV Primer	Final Repair	
77	230640	High Tech Clear Seam Sealer	Seal/Adh	
78	333356	Ure-Foam A	Seal/Adh	
79	322731	Ure-Foam B	Seal/Adh	
97	302115	Bonderite C-SO 118 Solvent Line Cleaner	Misc Solvent/Cleaner	
98	30098169	CN31947 Purge Solvent	Misc Solvent/Cleaner	Various HAP ingredients
102	30103241	PS3580 (booth)	Misc Solvent/Cleaner	

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.

Review Completed By: **Alex Thibeault**
Review Date: **10/15/18**

MACT WORK PRACTICE PLAN APPENDIX
Part (a), Section 2: Identifying HAP Material Locations
Flint Assembly & Flint Metal Center

Part (a), Section 2, must be completed and/or reviewed at least once per Title V deviation reporting period (e.g., semi-annually) 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	Bay	Conveyance Method 40 CFR §63.3094 (b)(3)	Process Owner	Comment
Ex.	Base Coat					
All BC Solventborne coatings id in Part (a) Section 1 containing OHAP	Storing	Main Plant	NN-41	Not Applicable	Paint Mix. Super.	Barrell storage area
All BC Solventborne coatings id in Part (a) Section 1 containing OHAP	Mixing	Main Plant	MM-42	Not Applicable	Paint Mix. Super.	Main Mix Room
All BC Solventborne coatings id in Part (a) Section 1 containing OHAP	Conveying	Main Plant	MM-42	Pumps, hard piping	Paint Maint. Superintendent	Main Mix Room
1	Seal./Adh.-- FLINT METAL CENTER & Body Sho	N/A Contains no HAPs				
	Storing			Not Applicable		
	Mixing			Not Applicable		
	Conveying			Not Applicable		
2	ELPO	N/A Contains no HAPs				
	Storing			Not Applicable		
	Mixing			Not Applicable		
	Conveying			Not Applicable		
3	Seal./Adh.--Paint Shop	N/A Contains no HAPs				
	Storing			Not Applicable		
	Mixing			Not Applicable		
	Conveying			Not Applicable		
4	Seal./Adh.-- Heavy Truck Repair					
Urefoam and High Tech Seam Sealer	Storing	Main Plant; Paint Shop	S65; F-2-31; Finesse	Not Applicable	Paint; General Assembly	Spot Repair, Finesse, Glass & Heavy Repair
Urefoam and High Tech Seam Sealer	Mixing	Main Plant; Paint Shop	S65; F-2-31; Finesse	Not Applicable	Paint; General Assembly	Spot Repair, Finesse, Glass & Heavy Repair
Urefoam and High Tech Seam Sealer	Conveying	Main Plant; Paint Shop	NA	Not Applicable	Paint; General Assembly	Spot Repair, Finesse, Glass & Heavy Repair
5	Deadener	N/A Contains no HAPs				
	Storing			Not Applicable		
	Mixing			Not Applicable		
	Conveying			Not Applicable		
6	Primer Surfacer	N/A Contains no HAPs				
	Storing			Not Applicable		
	Mixing			Not Applicable		
	Conveying			Not Applicable		

7	Base Coat	N/A Contains no HAPs				
	Storing			Not Applicable		
	Mixing			Not Applicable		
	Conveying			Not Applicable		
8	Clear Coat					
CC Component A and Glory Red Tinted Clear	Storing	Main Plant; Paint Shop	BB63; K 1.24; J21-J18; F-2-31	Not Applicable	Paint; General Assembly	Mix Room, Spot Repair; Final Paint Repair
CC Component A and Glory Red Tinted Clear	Mixing	Main Plant; Paint Shop	BB63; K 1.24; J21-J18; F-2-31	Not Applicable	Paint; General Assembly	Mix Room, Spot Repair; Final Paint Repair
CC Component A and Glory Red Tinted Clear	Conveying	Paint Shop	L30; J21-18	Pumps, hard piping	Paint	Main Mix Room; CC Booths
9	Windshield Installation	N/A Contains no HAPs				
	Storing			Not Applicable		
	Mixing			Not Applicable		
	Conveying			Not Applicable		
10	Final Repair					
Final Repair paints and additives id in Part (a) Section 1 containing OHAP	Storing	Main Plant; Paint Shop	BB63; K 1.24; F-2-31	Not Applicable	Paint; General Assembly	Mix Room; Spot Repair; Final Paint Repair
Final Repair paints and additives id in Part (a) Section 1 containing OHAP	Mixing	Main Plant; Paint Shop	BB63; K 1.24; F-2-31	Not Applicable	Paint; General Assembly	Mix Room; Spot Repair; Final Paint Repair
Final Repair paints and additives id in Part (a) Section 1 containing OHAP	Conveying	Main Plant; Paint Shop	BB63; K 1.24; F-2-31	Not Applicable	Paint; General Assembly	Mix Room; Spot Repair; Final Paint Repair
12	Thinners/Reducers	N/A Contains no HAPs				
	Storing	Paint Shop		Not Applicable		
	Mixing	Paint Shop		Not Applicable		
	Conveying	Paint Shop		Not Applicable		
13	Cleaning Agents					
Misc Solvent/Cleaners id in Part (a) Section 1 containing OHAP	Storing	Main Plant Paint Shop	B63; F-2-31; K 1.24; J 04; K 20; J31-J28; L22	Not Applicable	Paint Mix Supervisor / SUM & HES	Final Repair, Spot Repair, Mix Room, Outside Mix Room, Booths
Misc Solvent/Cleaners id in Part (a) Section 1 containing OHAP	Mixing	Main Plant Paint Shop	B63; F-2-31; K 1.24; J 04; K 20; J31-J28; L22	Not Applicable	Paint Mix Supervisor / SUM & HES	Final Repair, Spot Repair, Mix Room, Outside Mix Room, Booths
Misc Solvent/Cleaners id in Part (a) Section 1 containing OHAP	Conveying	Main Plant Paint Shop	B63; F-2-31; K 1.24; J 04; K 20; J31-J28; L22	Pumps, hard piping	Paint Mix Supervisor / SUM & HES	Final Repair, Spot Repair, Mix Room, Outside Mix Room, Booths

Review Completed By: **A. Thibeault**

Review Date: **10/11/2018**
10/15/2018

MACT WORK PRACTICE PLAN APPENDIX
Part (b): Storage, Mixing, and Conveying HAP Materials
Flint Assembly & Flint Metal Center

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

TOPIC: Storing HAP materials. ACTIONS: 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. 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.					
HAP Material Category	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/Validation
ITEM # b.1 40 CFR §63.3094 (b)(1)	Seal./Adh.--FLINT METAL CENTER & Body Shop				No HAP containing products
	ELPO				No HAP containing products
	Seal./Adh.--Paint Shop				No HAP containing products
	Seal./Adh.--Repair	5/7/2018	10/15/2018		
	Deadener				No HAP containing products
	Primer Surfacer				No HAP containing products
	Base Coat				No HAP containing products
	Clear Coat	5/7/2018	10/11/2018		
	Windshield Installation				No HAP containing products
	Final Repair	5/7/2018	10/15/2018		
	In-Line or Spot Repair	5/7/2018	10/11/2018		
	Thinners/Reducers				No HAP containing products
	Cleaning Agents	5/7/2018	10/11/2018		

TOPIC: Minimizing HAP material spills.

ACTIONS:

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.

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.2
40 CFR
§63.3094
(b)(2)

HAP Material Category	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/Validation
Seal./Adh.--FLINT METAL CENTER & Body Shop					No HAP containing products
ELPO					No HAP containing products
Seal./Adh.--Paint Shop					No HAP containing products
Seal./Adh.--Repair	5/7/2018	10/15/2018			
Deadener					No HAP containing products
Primer Surfacer					No HAP containing products
Base Coat					No HAP containing products
Clear Coat	5/7/2018	10/11/2018			
Windshield Installation					No HAP containing products
Final Repair	5/7/2018	10/15/2018			
In-Line or Spot Repair	5/7/2018	10/11/2018			
Thinners/Reducers					No HAP containing products
Cleaning Agents	5/7/2018	10/11/2018			

TOPIC: HAP material conveyance.

ACTIONS:

1. Confirm that HAP materials are conveyed according to WPP.
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."
3. Enter review date for each HAP category in box under appropriate inspection period.

ITEM # b.3
40 CFR
§63.3094
(b)(3)

HAP Material Category	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments / System Failure Details (i.e., date, nature of failure, corrective action)
Seal./Adh.--FLINT METAL CENTER & Body Shop					
ELPO					
Seal./Adh.--Paint Shop					
Seal./Adh.--Repair	5/7/2018	10/15/2018			
Deadener					
Primer Surfacer					
Base Coat					
Clear Coat	5/7/2018	10/11/2018			
Windshield Installation					
Final Repair	5/7/2018	10/15/2018			
In-Line or Spot Repair	5/7/2018	10/11/2018			
Thinners/Reducers					
Cleaning Agents	5/7/2018	10/11/2018			

TOPIC: Keeping mixing vessels closed, unless adding or removing material.

ACTIONS:

1. Conduct a visual inspection of each HAP material mixing area identified in "Part (a), Section 2."
2. Confirm that vessels are kept closed, unless adding or removing material.
3. Close vessel if any are found open and note occurrence(s) in the "Comments/Validation" column.
4. Re-instruct employees regarding proper mixing vessel 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.4
40 CFR
§63.3094
(b)(4)

HAP Material Location	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/Validation
Main Mix Room	5/7/2018	10/11/2018			
Satellite Mix Stations	5/7/2018	10/11/2018			
In-Line or Spot Repair	5/7/2018	10/11/2018			

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.--FLINT METAL CENTER & Body Shop					
ELPO					
Seal./Adh.--Paint Shop					
Seal./Adh.--Repair	5/7/2018	10/15/2018			
Deadener					
Primer Surfacer					
Base Coat					
Clear Coat	5/7/2018	10/11/2018			
Windshield Installation					
Final Repair	5/7/2018	10/15/2018			
In-Line or Spot Repair	5/7/2018	10/11/2018			
Thinners/Reducers					
Cleaning Agents	5/7/2018	10/11/2018			

Inspection Completed By:	A. Thibeault
Inspection Date:	10/11/2018
	10/15/2018

MACT WORK PRACTICE PLAN APPENDIX
Part (c): Cleaning and Purging of Coating Equipment
Flint Assembly & Flint Metal Center

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

STEPS TO COMPLETING PART (c):

- Evaluate site practices for ITEMS # c.1.i through c.1.viii are properly identified in Work Practice
- 1) 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)	Vehicle body wipe
	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
ITEM # c.1.ii 40 CFR §63.3094 (c)(1)(ii)	Coating line purging emissions
	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)	Flushing of coating systems (system clean out)
	Keeping solvent tanks closed
	Recovering and recycling solvents
	Use of low-HAP or no-HAP solvents
ITEM # c.1.iv 40 CFR §63.3094 (c)(1)(iv)	Cleaning of spray booth grates
	Controlled burn off
	Rinsing with high pressure water
	Use of low-HAP or no-HAP cleaners
ITEM # c.1.v 40 CFR §63.3094 (c)(1)(v)	Cleaning of spray booth walls
	Use of masking materials (paper, plastic, etc.)
	Use of spray on masking
	Use of rags and manual wipes instead of spray application
	Controlled access to cleaning solvents
ITEM # c.1.vi 40 CFR §63.3094 (c)(1)(vi)	Cleaning of spray booth equipment (robots, hoses, etc.)
	Use of covers on equipment
	Use of parts cleaners (off-line submersion cleaning)
	Use of low-HAP or no-HAP cleaners
	Controlled access to cleaning solvents

ITEM # c.1.vii 40 CFR §63.3094 (c)(1)(vii)	Cleaning of external spray booth areas
	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)	Housekeeping measures not addressed above
	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