

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

A356939118

FACILITY: Axalta Coating Systems, LLC- Mt Clemens Plant		SRN / ID: A3569
LOCATION: 400 GROESBECK HWY., MOUNT CLEMENS		DISTRICT: Southeast Michigan
CITY: MOUNT CLEMENS		COUNTY: MACOMB
CONTACT: Molly Dwinells , Environmental Contact Person		ACTIVITY DATE: 03/22/2017
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Level 2 Scheduled Inspection		
RESOLVED COMPLAINTS:		

On March 22, 2017, I conducted a level 2 scheduled inspection at Axalta Coating Systems, LLC located at 400 N. Groesbeck Highway, Mt. Clemens, MI 48043. The purpose of the inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the administrative rules, and the facility's Clean Air Act of 1990, Title V, Renewable Operating Permit (ROP) No. MI-ROP-A3569-2011d. During the inspection, I was accompanied by Ms. Molly Dwinells, Environmental Coordinator and current facility contact person. At the pre-inspection conference, I showed my ID Badge and stated the purpose of my visit.

This facility was previously called DuPont Mt. Clemens Plant, E.I. Du Pont De Nemours and Company. On November 1, 2012, a company transfer of ownership and name change request was approved to Dupont Performance Coatings, LLC. At that time, the facility contact informed me that all of the coatings manufacturing businesses of E. I. DuPont Nemours and Company were being consolidated into one LLC company. On May 23, 2013, the AQD Southeast Michigan District received a request for facility name change to Axalta Coating Systems, LLC. The name change request was processed and got approved effective May 29, 2013. During the follow-up inspection, I was informed that DuPont Performance Coatings, LLC sold its coating manufacturing business to Axalta Coating Systems, LLC.

The facility manufactures various types of paints and resins (components of coatings) primarily for the automotive industry. The coatings produced can either be water based or solvent based coatings. The facility manufactures epoxy, urethane, and acrylic resins in 5 reactors. In addition, the facility manufactures dispersions and other intermediates as components for making original equipment manufacturing (OEM) automotive paints and primers. The finished products coatings are in the form of e-coat, basecoat, primer, color coat, and clear coat. Each process or sub-process may involve one to several tanks (process/reactor and/or storage) and other ancillary equipment. Some processes may include a particulate and/or VOC emission control equipment such as dust collectors, condenser system, and a thermal oxidizer. Majority of cleaning solvents are reclaimed on-site. Raw materials and intermediates are stored in bulk and/or containers. Finished products gets stored and shipped in various container sizes as specified by customers.

The company's potential Volatile Organic Compound (VOC) emissions facilitywide are greater than 100 tons per year making the facility subject to the Clean Air Act of 1990, Title V, Renewable Operating Permit program. The facility has applied and obtained a

Title V permit which is currently enforceable as ROP No. MI-ROP-A3569-2011d. The facility is operating under an enforceable application shield since the facility's current ROP renewal application is still under processing. After ROP No. MI-ROP-A3569-2011d was issued, Axalta obtained Permit to Install (PTI) No. 75-15 on May 14, 2015, to enable EU-ECOATSUP to be moved from FG-RULE290 to FG-DISP-TANKS; obtained PTI No. 113-15 on October 2, 2015, related to requests to modify some applicable requirements within the current ROP No. MI-ROP-A3569-2011d; obtained PTI No. 181-16 on January 18, 2017, related to request to modify certain conditions in EU-WBSB; and obtained PTI No. 42-16A on March 31, 2017, related to some modification requests on R & D spraybooths located in various locations within the facility. Per AQD staff Sebastian Kallumkal, the ROP renewal application is in working draft status awaiting issuance of PTI 42-16A to incorporate additional applicable requirements in the working draft.

On February 15, 2017, I conducted an initial records review process and compliance monitoring as part of my partial level 2 compliance inspection. I examined the electronic continuous monitoring data such as pressure drops and temperature requirements. The company also submitted printed copies of the records per the applicable requirements in ROP No. MI-ROP-A3569-2011d and the abovementioned permits to install. On January 15, 2017, AQD staff Sebastian Kallumkal and I conducted a walk through around the facility to verify equipment/processes relative to the ROP renewal application and an initial compliance inspection.

The facility's current and effective Title V permit, ROP No. MI-ROP-A3569-2011d, includes several emission units and flexible groups. The RO permit includes 10 individual emission units (EUs) with applicable requirements (ARs) namely: EU-RESIN-REACT-4, EU-RESIN-REACT-5, EU-RESIN-REACT-6, EU-RESIN-REACT-7, EU-REACT-8, EU-WBI, EU-IMP, EU-MEL-UNLOAD, EU-S-MEDIA-MILLS(1-4), and EU-WBSB. The ROP also contain 8 flexible groups namely: FG-RESIN-CATHODIC, FG-RESIN-DC8, FGRULE290, FG-DISP-TANKS, FG-THERMOX-MIXTANKS, FG-RULE284TANKS, FGCOLDCLEANERS, and FGRULE287(c).

SOURCE-WIDE CONDITIONS – the facility took individual Hazardous Air Pollutant (HAP) and combined HAPs restrictions to make the facility synthetic minor for HAPs. Per ROP No. MI-ROP-A3569-2011d(B)(SOURCE-WIDE CONDITIONS)(I)(1), the highest FY 2016 individual HAP monthly 12-month rolling total emission for December 2016 showed 1.9 tons for Glycol Ethers and less than the 9 tons/year permit limit. Per ROP No. MI-ROP-A3569-2011d(B)(SOURCE-WIDE CONDITIONS)(I)(2), the highest FY 2016 aggregate HAPs monthly 12-month rolling total emissions showed for June 2016 at 5.15 tons and less than the 22.5 tons permit limit. In December 2016, the monthly 12-month rolling total aggregate HAPs showed 4.54 tons.

EU-RESIN-REACT-4 – also known as Reactor 4. This process manufactures acrylic resin for automotive topcoats. The process consists of a 2500-gallon reactor tank (RR-4E), a monomer weigh tank (WT-4E), a catalyst weight tank (CT-4EFD), a quench tank (QT-4E), a decanter (DT-4E), a feed tank (FT-4E), a receiver (RT-4E), a charge tank (CT-4E), and a thin tank (TT-4E). The basic process is to mix reactants at elevated temperature for polymerization process to form the resin, cool the resin using a condenser system, filter, and store the product. This process does not have a pollution

control equipment. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-4)(I)(1), the highest FY2015 monthly 12-month rolling total VOC emission rate was emitted in December 2016 at 0.85 ton and less than the 4.5 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-4)(III)(1, 2, & 3), I observed the waste solvents were stored in closed containers during the January 15 facility walk through inspection. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-4)(IV), the tanks and mills I observed have covers and I did not observe any visible emissions in the area. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-4)(I)(2) and (VI)(1, 2, & 3), the permittee calculated 0.48 lb. VOC per 1000 lb. resin produced and less than the 0.5 permit limit. Permittee also keeps monthly records of amount of resins produced and highest in August 2016 at 442,216 lb. for FY 2016.

EU-RESIN-REACT-5 – also known as Reactor 5. This process manufactures urethane cross linkers and other intermediates for automotive cathodic primer. The process consists of a 2500-gal reactor tank, two raw materials tanks (WT-5M & MDI-5), a decanter (DT-5), a receiver tank (RT-5), and a thin tank (5M-TT). This process has a condenser system to capture and control VOC emissions. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-5)(I)(1), the highest FY2016 monthly 12-month rolling total VOC emission rate was emitted in April 2016 at 0.803 ton and less than the 2.0 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-5)(IV)(1), VOC emissions from the reactor, weigh, decanter, and thin tanks were routed to the condenser system. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-5)(VI)(1, 2, 3, & 4), permittee kept records of resins produced and calculated monthly and 12-month rolling VOC emissions. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-5)(I)(2), permittee calculated the VOC emission factor and the table showed a range of 0.112 through 0.163 lb. VOC/1000 lb. of organic resin produced and less than the 0.22 permit limit. I observed a parts washer in this area. The lid was closed and safety operating instructions were in place.

EU-RESIN-REACT-6 – also known as Reactor 6. This process manufactures acrylic resins for automotive topcoats. The process consists of a 2500-gal reactor tank (RR-6A), a monomer weigh tank (WT-6A), catalyst weight tank (6A-CTFD), a quench tank (QT-6A), a decanter (DT-6A), a feed tank (FT-6FEED), a charge tank (FT-6CHARG), and a thin tank (TT-6A). This process does not have a VOC emissions control system. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-6)(I)(1), the highest FY2016 monthly 12-month rolling total VOC emission rate was emitted in August 2016 at 1.439 tons and less than the 4.5 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-6)(III)(1, 2, & 3), I did not observe any spills on the floor that may be caused by reactor loading and the containers for waste solvent storage were closed during the January 15, 2017 walk through. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-6)(IV), all mixing tanks and dispersion mills have covers. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-6)(VI)(1, 2, & 3), permittee kept records of resins produced and calculated monthly and 12-month rolling VOC emissions using a calculated emission factor. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-6)(I)(2), permittee calculated the VOC emission factor and the table showed a 0.48 lb. VOC/1000 lb. of organic resin produced and less than the 0.50 permit limit.

EU-RESIN-REACT-7 – also known as Reactor 7. This process manufactures epoxy grind and backbone resins for automotive cathodic primer. The process consists of a 5000-gal reactor tank (RR-7N), three reactor weigh tanks (WT-71N, 72N, & 73N), a charge tank (CT-74N), a receiver tank (RT7N), another receiver tank shared with Reactor 8 (RT8700), three hold tanks (HT-81 – 83) as well as a stripper shared with Reactor 8 process, and two thin tanks (TT-71N & 73N). This process has a condenser system to capture and control VOC emissions. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-7)(I)(1), the highest FY2016 monthly 12-month rolling total VOC emission rate was emitted in March 2016 at 0.994 ton and less than the 2.0 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-7)(III)(1, 2, 3), I did not observe any spills on the floor that may be caused by reactor loading and the containers for waste solvent storage were closed. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-7)(IV), all stationary and portable reactor tanks had covers. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-7)(VI)(1, 2, 3, & 4), permittee calculated the VOC emission factor, kept records of resins produced, and calculated monthly and 12-month rolling VOC emissions. Per ROP No. MI-ROP-A3569-2011d(C)(EU-RESIN-REACT-7)(I)(2), permittee calculated the VOC emission factor and the table showed a range of 0.09 through 0.13 lb. VOC/1000 lb. of organic resin produced and less than the 0.50 permit limit.

EU-REACT-8 – also known as Reactor 8. This process manufactures epoxy backbone resins for automotive cathodic primer. The process consists of a 5000-gal reactor tank, two reactor weigh tanks (WT-81 & 82), four charge tanks (CT81 – 84), two receiver tanks (RT-8 & RT8700), and one 12,500-gal thin tank (TT-8). This process has a condenser system to capture and control VOC emissions. Per ROP No. MI-ROP-A3569-2011d(C)(EU-REACT-8)(I)(1), the highest FY2016 monthly 12-month rolling total VOC emission rate was emitted in April 2016 at 2.352 tons and less than the 6.9 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-REACT-8)(III)(1, 2, 3), I did not observe any spills on the floor that may be caused by reactor loading and the containers for waste solvent storage were closed. Per ROP No. MI-ROP-A3569-2011d(C)(EU-REACT-8)(IV), all stationary and portable reactor tanks have covers. Per ROP No. MI-ROP-A3569-2011d(C)(EU-REACT-8)(VI)(1, 2, 3, & 4), permittee calculated the VOC emission factor, kept records of resins produced, and calculated monthly and 12-month rolling VOC emissions. Per ROP No. MI-ROP-A3569-2011d(C)(EU-REACT-8)(I)(2), permittee calculated the VOC emission factor and the table showed a range of 0.06 through 0.09 lb. VOC/1000 lb. of organic resin produced and less than the 0.50 permit limit.

EU-WBI – refers to waterborne intermediate coating manufacturing involving dispersion and other intermediate material production processes. The color or pigmented materials go through a mechanical process to disperse the particles for waterborne paint manufacturing, using LMZ mills (LMZ 81-86), Schold Mill (SM 55), and portable tanks. There are no stacks associated with this process. The intermediates process blends resins, solvent (including water), & aluminum paste, or mica pearls, or Laponite into one of five process tanks (W1250, 1253, 1255, 2452, & 2456). A dust collector (DC-06) is used to control emissions during powder loading. This emission unit is also part of FG-DISP-TANKS. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBI)(I)(1), the highest FY2016 monthly 12-month rolling total VOC emission rates were emitted in August 2016 at 1.867 tons each and less than the 3.8 tpy permit limit. Per ROP No. MI-

ROP-A3569-2011d(C)(EU-WBI)(II), the highest monthly 12-month rolling total waterborne intermediate coating production occurred in December 2016 at 2,046,034 gallons and less than the 4,500,000 gallons permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBI)(VI)(1, 2, & 3), permittee kept monthly and 12-month rolling total VOC and gallons of product produced. I observed a parts washer in this area. The lid was closed and safety operating instructions were in place.

EU-IMP – refers to Improved Manufacturing Process, an automated production process of pigmented solvent borne products. It consists of seven 500-gal dosing tanks (CST- 1 through 7), three 250-gal dosing tanks (CST- 11 through 13), four solvent viscosity adjustment tanks (VAT-1 & 2, vented to the room; and VAT-3 & 4, vented outside); two 3000-gal blend tanks (MB10 & MB14); two storage tanks (MB8 & MB11); two fill heads; and a mix head. The process has no VOC emission control but it is equipped with a manifold venting system that reduces VOC emission from Blend Tanks (MB10 & MB14), Wash Tanks (WT-2 & 3), and Product Damper Tanks (DT-1 & FD-1). Per ROP No. MI-ROP-A3569-2011d(C)(EU-IMP)(I)(1), the highest FY2016 monthly 12-month rolling total VOC emission rate was emitted in June 2016 at 4.825 tons and less than the 30.0 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-IMP)(II), the highest monthly 12-month rolling coating production total occurred in June 2016 at 1,206,324 gallons and less than the 2,400,000 gallons permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-IMP)(III)(1 & 2), I did not observe any spills or splashing while at the area. Per ROP No. MI-ROP-A3569-2011d(C)(EU-IMP)(IV), the tanks were covered. Per ROP No. MI-ROP-A3569-2011b(C)(EU-IMP)(VI)(1, 2, & 3), permittee kept monthly and 12-month rolling total VOC and gallons of product produced.

EU-MEL-UNLOAD – refers to Melamine resins unloading operation. The facility receives these resins from off-site through 5,000 gallon vehicles that unload at stations 4 & 5. Per ROP No. MI-ROP-A3569-2011d(C)(EU-MEL-UNLOAD)(I)(1), the submitted records showed a consistent 0.0880 lb./hr monthly average of Formaldehyde emission rate and below the 0.28 lb./hr. permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-MEL-UNLOAD)(I)(2), records showed that the monthly 12-month rolling total Formaldehyde emission rate was highest in October 2016 at 0.0018 ton and below the 0.24 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-MEL-UNLOAD)(III), the highest resin monthly 12-month rolling total loading hours occurred in February 2016 at 392 hours and below the permit limit of 1752 hours/12 months.

EU-S-MEDIA-MILLS – refers to small media mills (tanks SM-9, SG-13, SG-14, & SG-28) for dispersion manufacturing. Only mixing and mechanical grinding operations occur in the tanks (no chemical reaction processes). A dust collector controls particulate emissions from powder loading to the tanks. Per ROP No. MI-ROP-A3569-2011d(C)(EU-S-MEDIA-MILLS)(I)(1), the highest FY2016 monthly 12-month rolling total VOC emission rate was emitted in February 2016 at 9.902 tons and less than the 25.0 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-S-MEDIA-MILLS)(II)(1), the highest monthly material produced occurred in February 2016 at 67,004 gallons and less than the 147,000 gallons permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-S-MEDIA-MILLS)(III)(1 & 2), I did not observe cleaning of equipment and the wash solvent storage containers were closed during the January 15 facility walk through. Per ROP No. MI-ROP-A3569-2011d(C)(EU-S-MEDIA-MILLS)(IV), the mills were covered. Each mill had a temperature monitoring device. Submitted records for January 2017

showed product temperatures at about 70°F and below the 150°F permit limit. The highest outlet temperature is around 120°F. Per ROP No. MI-ROP-A3569-2011d(C) (EU-S-MEDIA-MILLS)(VI), permittee kept monthly and 12-month rolling total VOC emission rates, gallons of materials produced, and the operating temperature of each mill. The temperature monitoring has an interlock system to shutdown the process if the temperature falls below the limit.

EU-WBSB – refers to small batch paint manufacturing process that was recently incorporated in the ROP from PTI No. 123-14 per ROP No. MI-ROP-A3569-2011d. This emission unit was previously under FG-RULE290. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBSB)(I)(1), the highest FY2016 monthly 12-month rolling total VOC emission rate were emitted in July and October 2016 at 0.103 ton and less than the 1.2 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBSB)(II)(1), the highest monthly material produced occurred in June 2016 at 23,003 gallons and more than the 21,250 gallons permit limit at that time. A Violation Notice (VN) was sent to the company and a response was received dated August 31, 2016. The facility has since kept in compliance with the 21,250 gallons monthly limit and on January 18, 2017, PTI No. 181-16 was issued increasing the limit to 58,333 gallons per month. I will be recommending to resolve this VN. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBSB) (III)(1 & 2), I did not observe cleaning of equipment and the wash solvent storage containers were closed during facility walk through. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBSB)(IV), the production vessels were covered. Per ROP No. MI-ROP-A3569-2011d(C)(EU-WBSB)(VI), permittee kept monthly and 12-month rolling total VOC emission rates and gallons of materials produced. Per Ms. Dwinnells, this emission unit is not covered by 40 CFR Part 63 Subpart CCCCCC because no pigment is being loaded and the material being handled is liquid and not solid.

FG-RESIN-CATHODIC – refers to the 2 alternating condenser system VOC emissions control from the resin reactors. One condenser is in defrost mode while the other one operates. These condenser system serves the emission units EU-RESIN-REACT-1, EU-RESIN-REACT-5, EU-RESIN-REACT-7, and EU-RESIN-REACT-8. The condensers are cooled by a refrigeration unit (Dynalene) and the condensate is collected in a 500 gallon portable tank with an extra tank on standby. Per ROP No. MI-ROP-A3569-2011d(D)(FG-RESIN-CATHODIC)(I), the FY2016 highest Toluene Diisocyanate average emission rate calculated monthly was at 0.00079 lb./hr. and less than the 0.002 lb./hr. permit limit. Per ROP No. MI-ROP-A3569-2011d(D)(FG-RESIN-CATHODIC)((III)(1) & (IV)(1)), I did not observe any potential problem with the condenser system during the walk through inspection and it appeared to be operating properly. Per Ms. Dwinnells, the malfunction abatement plan (MAP) that handles preventative maintenance and any potential malfunctions, is being implemented. The submitted records for February 2017 showed average operating temperature of heat exchanger HX-28 at 43.54°F and heat exchanger HX-29 at 38.90°F. Per ROP No. MI-ROP-A3569-2011d(D)(FG-RESIN-CATHODIC)((IV)(2) & (VI)(1)), permittee records the exhaust temperature electronically at 15 minutes interval and 90% of operating time. Per ROP No. MI-ROP-A3569-2011d(D)(FG-RESIN-CATHODIC)(VI)(2-4)), permittee keeps records of any bypass, exceedances and calculates emissions per Appendix 7. Per facility contact, permittee is not subject to 40 CFR Part 63 Subpart CCCCCC due to material usage.

FG-RESIN-DC8 – this flexible group refers to a common dust collector particulate control (DC8) for EU-RESIN-REACT-1, EU-RESIN-REACT-7, and EU-RESIN-REACT-8 during powder loading. Per ROP No. MI-ROP-A3569-2011d(D)(FG-RESIN-DC8)(VI)(1-2), a continuous pressure drop monitor was installed and operating properly. During the March 22 walk through inspection, the pressure drop across the dust collector for DC 8 was 2.5 inches water gauge. The dust collectors are routinely checked on a monthly basis and any activity performed is recorded.

FGRULE290 – refers to PTI exempt equipment/processes pursuant to AQD Rules 278 and 290. The emission units included are: EU-RESIN-REACT-1, EU-BT(1-3), EU-FSO, EU-LMZ(1-4), EU-TSM, EU-CGM1000M(22), EU-CGM1000S(8), EU-CGM2500(5), EU-CGM250(4), EU-CGM3500(5), EU-CGM1500(1), EU-CGM5000(4), EU-CGM500(9), EU-SOLV-RECOVERY, EU-QA-ECOAT, EU-SBI(1-11), EU-ECOATSUP, and EU-MBFPT(1-22). Per ROP No. MI-ROP-A3569-2011d(D)(FGRULE290)(I)(3), the emission units/flexible group that emit particulate contaminants, have appropriately designed fabric filter system. I did not observe any visible emissions while at the facility. Per ROP No. MI-ROP-A3569-2011d(D)(FGRULE290)(VI)(1), permittee kept records of each air contaminant, emission unit control/uncontrolled, carcinogenic/non-carcinogenic, ITSL/IRSL, calculations of emissions and the summaries. All the ITSL and IRSL calculated emission values are less than the Rule 290 limits. Permit to Install No. 75-15 was issued last May 14, 2015 to remove EU-COATSUP from FG-RULE290 and include the same emission unit in FG-DISP-TANKS.

FG-DISP-TANKS – this flexible group refers to EU-S-MEDIA-MILLS(1-4), EU-LMZ(1-4), EU-TSM, EU-SBI(1-11), EU-WBI, EU-DISP-TANK(1-11), and EU-COATSUP. These emission units are associated with dispersion premix tanks. Emissions from EU-S-MEDIA-MILLS(1-4), EU-TSM, EU-SBI(1-11), EU-DISP-TANK(1-11), EU-WBI, and EU-COATSUP, are controlled by dust collector DC-06 during powder loading. Emissions from the two dispersion pre-mixers of the EU-LMZ(1-4) are controlled by two dust collectors, LMZREDHP & LMZBLKHP. Per ROP No. MI-ROP-A3569-2011d(C)(FG-DISP-TANKS)(I)(2), the highest FY2016 monthly 12-month rolling total VOC emission rate for EU-DISP-TANK was emitted in June 2016 at 11.325 tons and less than the 22.5 tpy permit limit. Per ROP No. MI-ROP-A3569-2011d(C)(FG-DISP-TANKS)(IV), the associated dust collectors appeared to be operating properly as I did not observe any visible emissions; and the collectors are being inspected weekly. I obtained a copy of a sample of inspection recordkeeping for the last quarter of CY 2016 showing no leaks/damage observed. During the March 22 walk through inspection, I observed a DC-06 pressure drop reading of 2.2 inches of water. A manual pressure drop reading is also being recorded at start and end of each pigment load; and submitted sample record showed 8 and 9.0+ inches of water gauge pressure readings respectively in December 2016. Per ROP No. MI-ROP-A3569-2011d(C)(FG-DISP-TANKS)(VI), permittee kept records of monthly and 12-month rolling total VOC emission rates, monthly routine checks of dust collectors, and the continuous pressure drop readings for the dust collectors. Per PTI No. 75-15, special condition FG-DISP-TANKS(I)(3), the EU-COATSUP monthly 12-month rolling total VOC emission rate was highest in May 2016 at 4.636 tons and less than the 6.9 tpy permit limit.

FG-THERMOX-MIX-TANKS – refers to emission units whose emissions are ducted into a thermal oxidizer for VOC control. The 29 emission units/tanks (solvent borne

clearcoat/basecoat tanks: C5001, 5002, 5003, 5004, 5005, 5006, & 5007; water borne tanks: W2402, 2406, 2424, 2434, 2436, 2438, 2440, 2442, 2446, 3612, 3620, 3622, 3628, 3630, 1204, 1214, 1216, 1218, 1226, 1232, 1244 & 4808) are paint final product mix tanks. Per ROP No. MI-ROP-A3569-2011d(D)(FG-THERMOX-MIX-TANKS)(I), the FY2016 highest reported monthly 12-month rolling total VOC emission rate after control occurred in January 2016 at 1.355 tons and less than the 2.0 tons permit limit. Per ROP No. MI-ROP-A3569-2011d(D)(FG-THERMOX-MIX-TANKS)(III)(1), I observed 1519°F oxidizer temperature in the electronic continuous monitor which was above the minimum temperature limit of 1500°F. Per ROP No. MI-ROP-A3569-2011d(D)(FG-THERMOX-MIX-TANKS)(IV), a continuous temperature monitoring device is installed and data can be accessed remotely at Ms. Dwinnells computer. I observed the temperature data during inspection and the temperature data points I observed were above permit limit. The temperature is electronically recorded and the monitoring device has an interlock system to shut the system down if the temperature falls below 1500°F for more than 15 minutes. Per ROP No. MI-ROP-A3569-2011d(D)(FG-THERMOX-MIX-TANKS)(VI)(1-5), the temperature device is calibrated every 6 months, coating use and VOC emissions records and calculations are conducted and kept monthly including 12-month rolling totals, and monthly summaries of temperature data.

FG-RULE284TANKS – refers to any existing or new (placed into operation after 7/1/79) or modified storage tanks that are exempt from the requirements of R336.1201 (NSR permitting) pursuant to R336.1284, and subject to 40 CFR 60.110(a), (b), and 60.116 (b). The emission units are EU-STORAGE-SOLV(1-21), EU-STORAGE-MONOM(1-6), EU-STORAGE-RESIN(1-65), and EU-STORAGE-MISC(1-8). Per ROP No. MI-ROP-A3569-2011d(D)(FG-RULE284TANKS)(IV & VI), permittee kept records of the above tanks including type, capacity, installation date, description of stored material, vapor pressure, specific gravity, applicable requirements, and temperature.

FGCOLDCLEANERS – refers to any cold cleaner (parts washer) that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(2)(h) or Rule 285(2)(r) (iv). Existing cold cleaners were placed into operation prior to July 1, 1979 while new cold cleaners were placed into operation on or after July 1, 1979. Aside from EU-COLD-CLEANER(1-4), permittee has 9 additional parts washers for a total of 13 units. Per ROP No. MI-ROP-A3569-2011d(D)(FGCOLDCLEANERS)(IV)(1-5), the air/vapor interface is less than 10 square feet each; the emissions are released in the general in-plant environment; there are no heated parts; and the lids are closed. Several of the parts washers that were inspected were discussed in the various emission units/flexible groups above. Per ROP No. MI-ROP-A3569-2011d(D)(FGCOLDCLEANERS)(VI)(1-4), the unit has serial number, date of installation, and posted written operating instructions. As mentioned above, I inspected a few random coldcleaners in various locations during the walk through inspection.

FG-RULE287(c) – refers to spray booth coating operation exempt from Rule 201 pursuant to Rule 278 and 287(2)(c). The R & D spraybooths that were originally part of this flexible group is now part of PTI No. 42-16 approved in July 2016 and recently modified as PTI No. 42-16A effective March 31, 2017. A total of 18 spraybooths comprise FG-R&DBooths. I inspected some of the booths and I found filters in place and no gaps between filters. I will defer compliance determination with PTI No. 42-16A for the next inspection cycle.

At the time of the inspection, I did not observe any noncompliance issues.

NAME R/A H

DATE 4/12/2017

SUPERVISOR Joyce BC

