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

A576433945

FACILITY: Ventra Evart, LLC		**SRN / ID:** A5764
LOCATION: 601 W. Seventh Street, EVART		**DISTRICT:** Cadillac
CITY: EVART		**COUNTY:** OSCEOLA
CONTACT: Nick Spivey , Environmental Specialist		**ACTIVITY DATE:** 03/03/2016
STAFF: Caryn Owens	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled Inspection & Records Review		
RESOLVED COMPLAINTS:		

On Thursday, March 3, 2016, Caryn Owens and Jeremy Howe of the Department of Environmental Quality (DEQ) – Air Quality Division (AQD) inspected Ventra Evart, L.L.C (Ventra) (SRN: A5764) located at 601 West Seventh Street in Evart, MI, Osceola County, Michigan. The site is located on the south side of West Seventh Street and consists of one building on the property. The field inspection and records review were to determine compliance with the Renewable Operating Permit (ROP) MI-ROP-A5764-2015. The site is currently a major source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs), and the source is subject to the following National Emission Standard for Hazardous Air Pollutants (NESHAPs): for Surface Coating of Plastic Parts and Products in 40 CFR, Part 63, Subpart PPPP; Commercial, and Institutional Boilers and Process Heaters in 40 CFR, Part 63, Subpart DDDDD; and for Stationary Reciprocating Internal Combustion Engines in 40 CFR, Part 63, Subpart ZZZZ. DEQ gave Mr. Nick Spivey, the Environmental Specialist with Ventra, an inspection brochure, at the time of the inspection. Additionally, a consent order is cited to the facility due to alleged failure to timely complete performance testing on the EUFASCIA-LINE, dated August 17, 2009, which has not been terminated as of the date of the field inspection.

Summary:
The activities covered during the field inspection and records review for the facility indicates the facility was in compliance with ROP MI-PTI-A5764-2015. AQD requested an updated MAP for the facility, and no additional actions are necessary at this time. Specific permit conditions that were reviewed are discussed below.

On-site Inspection:
During the field inspection it was partly cloudy with wind speeds between 5 to 10 miles per hour out of the east-southeast, and approximately 40°F. DEQ met Mr. Spivey, for a facility inspection and records review. Mr. Spivey accompanied DEQ through the facility to observe the permitted emission units and associated processes. Ventra manufactures automotive parts including trim components, exterior fascia parts, and tail light assemblies. The facility has a fascia line that uses both automatic and manual spray booths where the parts are painted using robots, and hand painted when necessary. Prior to entering the spray booths, the parts are washed by a four stage washing system, then blown off to dry, and painted, and dried again. The fascia line is controlled by a water curtain and regenerative thermal oxidizer (RTO), and the manual booths are controlled by fabric filters. The fascia system air is re-circulated through the line, where only a certain percentage goes to the RTO.

The facility also has manual spray booths called the North C line that operate manual spray booths C6-C10, Area D service manual booth (asset No. AM4698), and the quality control lab manual spray booth area (asset No. AM3800). These manual spray booths are controlled by fabric filters. DEQ also observed the paint kitchen that contained 29 systems for 110 gallons of base coat, Ventra also has two adhesion promoter (AP) systems, four clear coat systems, one 2K clear coat system, eight pigable basecoat systems, and two pigable clearcoat systems. The pigable systems are set-up in 55 gallon drums and can be changed quickly (within a day), whereas the other systems are changed approximately every six months because they are more difficult to clean the lines.

Records Review:

Source-Wide Conditions: These Conditions apply to the entire stationary source, including all process equipment covered by other permits, grand-fathered equipment and exempt equipment.

I. Emission Limits:
The source wide emission limit for volatile organic compounds (VOCs) is 225 tons per year, based on a 12-month rolling time period. Based on the records reviewed, the highest amount of VOC emissions reported for the facility is 33.8 tons per 12-month rolling time period. Based upon the records reviewed, the

facility is within the permitted VOC emission limits.

II. Material Limits:
Material Limits are not applicable for Source-Wide Conditions.

III. Process/Operational Restrictions:
Process/Operational Restrictions are not applicable for Source-Wide Conditions.

IV. Design/Equipment Parameters:
Design/Equipment Parameters are not applicable for Source-Wide Conditions.

V. Testing/Sampling:
Testing/Sampling are not applicable for Source-Wide Conditions.

VI. Monitoring/Recordkeeping
DEQ observed the paint kitchen where each coating is stored. Each coating system had daily log sheets to track the amount of coating used on a daily basis. The daily log sheets are entered into a computer system which is then used to calculate daily emissions and VOC content and volume for each coating used. The facility calculates the VOC emissions in tons per month, and 12-month rolling time period and were reported to the DEQ, which is discussed in Emission Limits above.

DEQ reviewed records of Ventra's cleanup and purge solvents used and reclaimed and monthly records for the daily hours of operation. The records were kept in satisfactory order.

VII. Reporting
Reporting of semi-annual reports and annual compliance reports for ROP certification were submitted to the DEQ in timely manner. During the reporting period the permittee reported all monitoring and associated recordkeeping requirements. The ROP Reporting Conditions were met and there were no deviations.

VIII. Stack/Vent Restrictions:
Stack/Vent Restrictions are not applicable for Source-Wide Conditions.

IX. Other Requirements
The facility is subject to a Consent Order, which has not been terminated as of the date of the field inspection.

EUFASCIA-LINE: This is a line to apply AP, base coat, and clear coat to fascia. There are automatic (robot) and manual booths for each coating type. The automatic booths are vented through a water curtain, and a RTO, and the manual booths use dry fabric filters for particulate control.

I. Emission Limits:
The emission limits are 168.3 pounds per hour and 135 tons per 12-month rolling time period. Based on the fourth quarter VOC Emission report, the VOC emissions from October 1, 2015 through December 31, 2015 ranged between 2.1 to 22.1 pounds per hour, and the 12-month rolling time period VOC emissions ranged between 24.8 to 31.8 tons per year for EUFASCIA-LINE. Based upon the records reviewed, the facility is within the permitted VOC emission limits.

II. Material Limits:
The permitted material limits are as follows for Ventra: 1.0 pounds of VOC per gallon of coating for AP, 0.7 pounds of VOC per gallon of coating for basecoat, and 0.7 pounds of VOC per gallon of coating for clearcoat. These material limits are all minus water as applied, after controls, based on a daily average. Based on the records reviewed, the actual AP VOC content ranged from 0.29 to 0.44 pounds of VOC per gallon minus water, after controls. The actual basecoat ranged from 0.22 to 0.33 pounds of VOC per gallon minus water, after controls, and the clearcoat ranged from 0.18 to 0.28 pounds of VOC per gallon minus water, after controls. The records reviewed indicated Ventra is in compliance with the material limits.

III. Process/Operational Restrictions:
The RTO shall not operate unless there is a minimum of 1,400 degrees Fahrenheit. During the inspection, the RTO was operating at a temperature of 1,458 degrees Fahrenheit. Additionally, according to the CAM

plan for Ventra, EUFASCIA-LINE cannot operate until the RTO is at least 1,400 degrees Fahrenheit, if the temperature drops below 1,400 degrees Fahrenheit, EUFASCIA-LINE completely shuts down.

The minimum overall VOC control efficiency (combined capture and destruction) is not to be less than 86 percent across EUFASCIA-LINE. Based on the most recent capture and destruction efficiency performance test, completed October 13 and 14, 2015, for the RTO, the overall combined control efficiency was 93 percent.

During the field inspection of Ventra, the automatic booth water wash, dry fabric filters and RTO appeared to be operating properly.

Ventra observed that that duct static pressure was not in compliance with the ROP prior to performance testing. Mr. Spivey contacted DEQ and explained the normal established inlet static duct pressure to resolve discrepancies of the actual inlet static duct pressure versus the referenced static duct pressure of 1.0 inches of water column in the ROP. During performance testing the inlet static duct pressure averaged 0.62 inches of water column.

The most recent Malfunction Abatement Plan (MAP) on file at the DEQ is from October 22, 2013. The MAP is to address the RTO, a preventative maintenance plan of the RTO, Performance monitoring variables, corrective action in the event of equipment failure, and fugitive air emissions minimization procedures. The performance monitoring variables indicates that normal operating range of the RTO is between 1,400 to 1,600 degrees Fahrenheit, and the inlet static pressure of the RTO is greater than 1.0 inches of water column. However, the most current MAP references an old ROP number, and a recent stack test established a more accurate static pressure of the RTO, and therefore, AQD requested that Ventra submits an updated MAP to reflect the current conditions for EUFASCIA-LINE.

IV. Design/Equipment Parameters:

According to Mr. Spivey, Ventra operates electrostatic guns for the automatic and manual booths for the application of basecoats and clearcoats. The spray guns are considered High Volume Low Pressure (HVLP) guns.

The appropriate range of the RTO to define proper operation shall be between 1,400 and 1,600 degrees Fahrenheit. As previously stated, during the field inspection, the RTO was at 1,458 degrees Fahrenheit.

Based on observations during the field inspection, a device to continuously monitor and record the inlet static duct pressure of the RTO has been installed.

V. Testing/Sampling:

The five most frequently used coatings and five coatings at random are tested annually for VOC content, as applied, minus water. The last analysis was completed in January 25, 2016, and the test results were submitted and reviewed by the AQD. Test results of the 2015 VOC Coating Testing indicated compliance with limits contained in the ROP.

October 2015 was the last capture and destruction efficiency testing that was completed for the facility. Based on the testing data, the RTO capture efficiency was 94.85 percent and the destruction efficiency was 97.90 percent.

Additionally, the performance testing completed, correlated the VOC emission rate in pounds per hour with the inlet static duct pressure. Based on the field inspection, the inlet static duct pressure 0.641 inches water column, which was similar to the inlet static duct pressure during performance testing.

VI. Monitoring/Recordkeeping:

DEQ observed the paint kitchen where each coating is stored. As previously stated, each coating system had daily log sheets to track the amount of coating used on a daily basis. The daily log sheets are entered into a computer system which is then used to calculate daily emissions and VOC content and volume for each coating used.

DEQ reviewed records of Ventra's cleanup and purge solvents used and reclaimed and monthly records for the daily hours of operation. The records were kept in satisfactory order.

DEQ reviewed records of the RTO temperatures and inlet static pressures. During the winter months the

RTO is not completely shut down during non-production periods, so the start-up of the fascia line wouldn't be delayed trying to have the RTO reach appropriate temperatures. The low temperatures and inlet static pressures are observed in the records during non-production time.

The facility calculates and records VOC emission rates in pounds per hour, tons per month, and tons per 12-month rolling time period, which are discussed above under Emission Limits.

Additionally, the facility submits semi-annual and annual CAM reports that informs DEQ of malfunctions that occurred at the facility. Any monitor downtime excursions or exceedances reported are discussed below in Reporting.

During the field inspection and records review, it appears the facility properly maintains the RTO, and properly monitors and records the monitoring data. Corrective actions are taken as soon as a malfunction has occurred. As previously stated, the facility reports monitor downtime on a semi-annual basis.

VII. Reporting:
Reporting of any deviations, quarterly reports, semi-annual reports, and annual compliance reports for ROP certification were submitted to the DEQ in timely manner.

Based on the most recent (2015) annual report, the facility reported 19 deviations. Majority of the deviations occurred when the average air flow was used to show compliance, which was changed to static pressure during the most recent ROP Renewal. The other deviations were due to the average temperature dropping below the minimum temperature, and the company took corrective action to fix the changing temperatures of the RTO.

The facility submitted quarterly reports that demonstrated compliance with VOC emission limits and material limits. Additionally, the facility submitted the proper testing protocol and reports to the DEQ within a timely manner.

During the reporting period the facility reported all monitoring and associated recordkeeping requirements of the ROP. There was no monitor downtime reported for EUFASCIA-LINE, and three CAM excursions reported. DEQ addressed the CAM excursions in the semi-annual review.

VIII. Stack/Vent Restrictions:
The stack heights for EUFASCIA-LINE were in compliance with the ROP diameters and heights.

IX. Other Requirements:
The equipment at the facility appeared to be well maintained. The purge solvents and coatings were captured and stored in closed 55-gallon containers. Waste materials are shipped off-site.

EUFIREPUMP1: An emergency diesel fuel-fired (compression ignition) reciprocating internal combustion engine (RICE) rated at 130 horsepower located at a major source of HAP emissions, used to power the building emergency fire suppression water pump. During the field inspection, DEQ was not able to access EUFIREPUMP1 building because it was locked and Mr. Spivey didn't have access to the key.

I. Emission Limits:
Emission Limits are not applicable with EUFIREPUMP1.

II. Material Limits:
Material Limits are not applicable for EUFIREPUMP1.

III. Process/Operational Restrictions:
EUFIREPUMP1 has not been used for any emergencies within the past year. EUFIREPUMP1 is operated once a week for 30 minutes. The maintenance records appeared to be complete. The facility chooses to change the oil on an annual basis, and the last oil change was January 19, 2015, and Ventra currently has another oil change scheduled for the week of March 21, 2016. The maintenance records are attached to this report.

IV. Design/Equipment Parameters:
According to Mr. Spivey, EUFIREPUMP1 is equipped with a non-resettable hour meter and the hours

shown on the meter will be recorded on the weekly maintenance checks.

V. Testing/Sampling:
Testing/Sampling is not applicable for EUFIREPUMP1.

VI. Monitoring/Recordkeeping:
The facility is not required to submit notifications for EUFIREPUMP1, since it is an emergency engine with no applicable emission limits.

There have been no malfunctions of EUFIREPUMP1.

The facility inspects the EUFIREPUMP1 on a regular basis in accordance with manufacturer's recommendations. DEQ observed that the oil changes were not recorded or the hours on the on the maintenance records, so DEQ requested these be included on the future maintenance records.

The facility chooses to change the oil on EUFIREPUMP1 on an annual basis. A oil analysis has not been performed.

Reporting:
Semi-annual reports and annual compliance reports for ROP certification were submitted to the DEQ in timely manner. No deviations for EUFIREPUMP1 were reported.

VIII. Stack/Vent Restrictions:
Stack/Vent Restrictions are not applicable for EUFIREPUMP1.

IX. Other Requirements:
The facility appears to comply with 40 CFR Part 63, Subpart ZZZZ requirements for EUFIREPUMP1.

EUBOILER1: A 1.82 MMBTU natural gas-fired boiler used to keep the fire suppression system water above the freezing point. According to Mr. Spivey, the boiler is going to be replaced within the next year.

I. Emission Limits:
Emission Limits are not applicable with EUBOILER1.

II. Material Limits:
Material Limits are not applicable for EUBOILER1.

III. Process/Operational Restrictions:
On January 28, 2016, Ventra submitted a Notification of Compliance indicating that a tune-up of the boiler system and a one-time energy assessment have been completed for EUBOILER1.

IV. Design/Equipment Parameters:
Design/Equipment Parameters are not applicable for EUBOILER1.

V. Testing/Sampling:
Testing/Sampling is not applicable for EUBOILER1.

VI. Monitoring/Recordkeeping:
Monitoring/Recordkeeping is not applicable for EUBOILER1.

VII. Reporting
Semi-annual reports and annual compliance reports for ROP certification were submitted to the DEQ in timely manner. No deviations for EUBOILER1 were reported. As previously stated, A NOC was submitted to the DEQ.

VIII. Stack/Vent Restrictions:
Stack/Vent Restrictions are not applicable for EUBOILER1.

IX. Other Requirements:
The facility appears to comply with 40 CFR Part 63, Subpart DDDDD requirements for EUBOILER1.

FGMISC-PLANT: The North C-Line (booths C6-C10) and the D Service Booth (Assest # AM 4698) and Area D drying oven. FGMISC-PLANT uses dry filter fabrics for particulate control.

I. Emission Limits:
The emission limits are 0.65 tons per day. Based on the fourth quarter VOC Emission report, the VOC emissions from October 1, 2015 through December 31, 2015 ranged between 0.04 to 0.14 tons per day. Based on the records reviewed, the facility is within the permitted VOC emission limits.

II. Material Limits:
The permitted material limit is 6.3 pounds of VOC per gallon of coating for FGMISC-PLANT. The material limit is minus water as applied, after controls, based on a daily average. Based on the records reviewed, the actual coating VOC content was 6.13 pounds of VOC per gallon minus water, after controls. The records reviewed indicated the Ventra is in compliance with the material limit at the facility.

III. Process/Operational Restrictions:
During the facility inspection, dry fabric filters were in place during the operations in FGMISC-PLANT. According to Mr. Spivey, the fabric filters are changed daily, or more frequently when necessary.

IV. Design/Equipment Parameters:
Design/Equipment Parameters are not applicable for FGMISC-PLANT.

V. Testing Sampling:
The five most frequently used coatings and five coatings at random are tested annually for VOC content, as applied, minus water. The last analysis was completed January 25, 2016, and the test results were submitted and reviewed by the AQD. Test results of the 2016 VOC Coating Testing indicated compliance with limits contained in the ROP.

VI. Monitoring/Recordkeeping:
DEQ observed the paint kitchen and chemical storage area at the facility where the coatings are stored. Each coating system had daily log sheets to track the amount of coating used on a daily basis. The daily log sheets are entered into a computer system which is then used to calculate daily emissions and VOC content and volume for each coating used.

VII. Reporting:
Reporting of any semi-annual reports, and annual compliance reports for ROP certification were submitted to the DEQ in timely manner. No deviations were reported for FGMISC-PLANT.

During the reporting period the permittee reported all monitoring and associated recordkeeping requirements of the ROP were met and there were no deviations.

The facility submitted quarterly reports demonstrating compliance with the VOC emission limits and material limits in the ROP. No deviations were reported for FGMISC-PLANT in the quarterly reports.

VIII. Stack/Vent Restrictions:
The stack heights for FGMISC-PLANT were in compliance with the ROP diameters and heights.

IX. Other Requirements:
Other Requirements are not applicable for FGMISC-PLANT.

FGMACT-PPPP: Requirements of the surface coating of plastic parts and products as required by 40 CFR, Part 63, Subpart PPPP. FGMACT-PPPP is applicable for emission units EUFASCIA-LINE, EUNORTH-C-LINE, and EUDBOOTH-4698. The pollution control equipment (the RTO) for FGMACT-PPPP is only applicable when the company chooses to use the "emission rate with add-on control" option; however, based on the most recent performance testing completed in October 2015, the facility did not meet the requirements to use the "emission rate with add-on control" option (see V. Testing/Sampling). Currently Ventra uses the "emission rate without add-on control" option for emission units EUFASCIA-LINE, EUNORTH-C-LINE, and EUDBOOTH-4698.

I. Emission Limits

As stated above, Ventra uses the "emission rate without add-on control" compliance option due to low HAP content of coatings used at the facility. The emission limit for organic HAPs for each existing thermoplastcic olefin (TPO) coating affected source is 0.26 pounds HAP per 12-month rolling time period of coating solids. Based on the most recent summary of HAP emissions from the coating operations from February 18, 2016, the facility is between 0.15 and 0.16 pounds HAP per 12-month rolling time period of coating solids. Based on the records reviewed, the facility is within the permitted HAP emission limit without using control.

II. Material Limits
The facility is not using the "Compliant material option" option, and therefore material limits do not apply.

III. Process/Operational Restrictions
The facility is **not** currently using the "emission rate with add-on controls" option; therefore, the process and/or operational restrictions do not apply.

IV. Design/Equipment Parameters
The facility continuously monitors the temperature of the RTO, the inlet static pressure, and air flow, and they appeared to be installed correctly.

V. Testing/Sampling
In October 2015, performance testing was conducted at the facility. Due to the construction of EU-FASCIA-LINE, the facility is not capable of showing compliance as a permanent total enclosure (PTE), so the facility attempted to show compliance with FGMACT-PPPP using a temporary total enclosure (TTE). During the performance testing the facility was **not** able to meet the following ways to show capture in the system of EUFASCIA-LINE Liquid-to-uncaptured-gas protocol using a temporary enclosure or building enclosure or a gas-to-gas protocol using a temporary total enclosure or building enclosure. Therefore the facility is **not** able to use "emission rate with add-on control" option to show compliance with FGMACT-PPPP.

VI. Monitoring/Recordkeeping
Certificates of Analysis provided by the manufacturer were used to determine the mass fraction of organic HAP and density of each coating, thinner, and other additives. These records were available upon request and are used to calculate the organic HAP emissions from the facility. The emission calculation records documenting compliance with the organic HAP emission limit were submitted in the semi-annual certification of compliance for NESHAP PPPP. The report was previously reviewed and documented Ventra was within the HAP emission limits.

VII. Reporting
Reporting of semi-annual reports, and annual compliance reports for ROP certification were submitted to the DEQ in timely manner. During the reporting period, the permittee reported all monitoring and associated recordkeeping requirements of the ROP, and there were no deviations.

VIII. Stack/Vent Restrictions
Stack/Vent Restrictions are not applicable with FGMACT-PPPP.

IX. Other Requirements
The facility is currently showing compliance with FGMACT-PPPP using the emission rate without add-on control.

FGCOLDCLEANERS: The facilities parts cleaner appeared to be well maintained. According to Mr. Spivey, the parts are dried appropriately, and the solvent is not agitated or heated to clean the parts. DEQ observed the lid closed and proper instructions on the parts cleaner. FGCOLDCLEANERS was in compliance with the ROP.

FGRULE290: There are currently no Rule 290 emission units located at the facility; therefore, this flexible group is not applicable at this time.

FGRULE287(c) Currently, the only emission unit the facility is using in this flexible group is the Quality Control lab manual spray booth, Asset # AM3800. The paint supplier uses the booth to spray new paints to determine their effectiveness. This booth is used very infrequent, and the facility is discussing moving the Quality Control lab to another portion of the facility, but this is still in discussion.

I. Emission Limits
Emission Limits are not applicable for FGRULE287(c).

II. Material Limits
Coating usage is limited to 200 gallons per month, minus water, as applied. According to Mr. Spivey, this booth is not used very often. Based on the records reviewed, the facility is well below the 200 gallons per month material limit.

III. Process/Operational Restrictions
Process/Operational Restrictions are not applicable for FGRULE287(c).

IV. Design/Equipment Parameters
Ventra uses fabric filters for particulate control in the quality control spray booth.

V. Testing/Sampling
Testing/Sampling are not applicable for FGRULE287(c).

VI. Monitoring/Recordkeeping
Records of paint usage were available upon request and were adequate to demonstrate compliance with the requirements of the ROP.

VII. Reporting
Reporting of semi-annual reports and annual compliance reports for ROP certification were submitted to the DEQ in timely manner. No deviations were reported for FGRULE287(c).

VIII. Stack/Vent Restrictions
Stack/Vent Restrictions are not applicable with FGRULE287(c).

IX. Other Requirements
Other Requirements are not applicable for FGRULE287(c).

NAME _____ DATE 3/3/16 SUPERVISOR _____