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

A622030910

FACILITY: Intertape Polymer Group		**SRN / ID:** A6220
LOCATION: 317 Kendall Avenue, MARYSVILLE		**DISTRICT:** Southeast Michigan
CITY: MARYSVILLE		**COUNTY:** SAINT CLAIR
CONTACT: Melissa Oakley , EHS Manager		**ACTIVITY DATE:** 08/31/2015
STAFF: Sebastian Kallumkal	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On Monday, August 31, 2015, at about 11:20 AM, I conducted an annual targeted inspection at Intertape Polymer Group located at 317 Kendall Avenue, Marysville, Michigan. The purpose of the inspection was to verify facility's compliance with requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994, the Renewable Operating Permit (ROP) No.: MI-ROP-A6220-20015, the Order of Consent AQD No. 10-1997, AQD Consent Order No. 28-2008, AQD Permit to Install No. 81.14 and 40 CFR 63, Subpart JJJJ-National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating.

At the facility I met Ms. Melissa Oakley, EHS Manager and Mr. Terry Smith, Maintenance Manager. I introduced myself and stated the purpose of the inspection. I provided her a copy of the DEQ Environmental Inspections: Rights and Responsibilities Brochure.

The facility produces pressure sensitive adhesive tape products. The primary emission units at the facility include (3) pressure sensitive tape manufacturing (coating) lines and one pilot line (FGCOATINGLINES: EUCOATINGLINE1, EUCOATINGLINE3, EUCOATINGLINE4 and EUPILOTLINE) and associated adhesive wet mix and WHIP processes (EUWETMIX&WHIP-OPERATIONS), Facility operates two air pollution control devices, to control volatile organic compounds (VOC) on portions of the adhesive coating lines, namely a vapor phase Carbon Adsorption Solvent Recovery System (SRS) and a Regenerative Thermal Oxidizer (RTO). Other processes include dry ingredient Mixer (EUCOMPOUNDING) controlled by two baghouses (North and South), two 20,000 gal underground solvent storage tanks (FGSTORAGETANKS), various (5) parts washers (soak tanks) (FGCOLDCLEANERS), a Rule 287(c) paint booth (FGRULE287), and the tote cleaning process.

During the pre-inspection meeting we discussed facility's operations. In October 2013, facility installed an R & D Pilot Line which includes adhesive manufacturing unit and a coating line. The installation of this process is exempt under Rule 290. This unit currently produces non-solvent adhesive coating. The unit is not currently operating because an oven has not been commissioned yet. In the future the facility wants to use it for production and also produce solvent based coating. She also explained that PTE (Permanent Total Enclosure) would be installed for this process and the emissions would be exhausted to the atmosphere. Melissa also indicated that they are preparing a permit to install application for this process for the solvent based adhesive coating process.

In May 2013, the facility started the installation of SAMR (Solvent Adhesive Mixing Research) Extrusion Unit. It is a combined process to make adhesive. The rubber grinding process and solvent mixing process are combined in this unit. This would replace two of the four mixers. AQD received permit to install (PTI) application for this process on April 16, 2014. PTI No. 81-14 is effective since September 30, 2014. The project is in its testing phase.

We also discussed the RTO media burnout which takes place couple of times a year. Previously Melissa had sent the burnout process to AQD. Mr. Smith indicated that he does not remember whether this process causes excessive visible emissions. They agreed to observe the process next time to verify if it causes visible emissions.

After the initial meeting, both accompanied me for an inspection of the facility. Initially we inspected the coating lines. All three coating lines were operating at the time of my inspection.

In Line 3, the R-Unit Hood (R-Unit Floor) where water based Release Coat is applied and IPA/QBX unit hood where QBX (mostly IPA) coating is applied are not controlled and the emissions are released directly to the atmosphere. The emissions from Dryer 1 after the R-Unit Hood and QBX Unit hood are directly vented to the RTO. The A-Unit Hood, B-Unit Hood, and C-Unit Hood where solvent based adhesive coatings are applied and the subsequent Dryer 2, Dryer 3 and Dryer 4 are continuously controlled by SRS. A base coat adhesive would be applied at the A-Unit hood if reinforced tape products are made. This is a thin coat of solvent adhesive. The Dryer 5 emissions are controlled by RTO. The exit hood (operator station) emissions are vented to the atmosphere directly. The LEL for the dryer emissions are monitored. Similarly the vents for these dryers are also monitored for bypass monitoring. The operator cannot accidentally or intentionally direct the Line 3 vents to bypass while the process is running. The dryers on Line 3 are natural gas fueled.

The turn switch for dryer and oven vents are calibrated on a monthly basis by someone physically inspecting the dampers on the roof, the operator switch and the CPMS display. The system will alarm at the coater station, in maintenance, in the solvent recovery control room and over the plant radio system if not in collect while running. Line 3 was manufacturing Reinforced Mylar coating tape at the time of my inspection.

I also inspected the parts washers in the area. The covers for parts washers were closed and the operating procedure was posted nearby

Coating Line 3: %LEL

D1Z1- Not in operation, D2Z1 - 3, D3Z1 - 29, D4Z1 – 33
D1Z2 –Not in operation, D2Z2 – 27, D3Z2 - 10, D4Z2 – 0
D2Z3 – 16, D3Z3 – 10, D4Z3 –17

D5Z1 – 0 PPM
D5Z2 – 0 PPM

Next I inspected Coating Line 4. In this line, the web goes through the R-unit hood where Release Coat/silicone coating is applied (uncontrolled – water-based). The web then goes through the R-oven (uncontrolled due to water-based coating). Release coat was not applied at the time of the inspection.. From there the web travels to the A-Unit hood where an adhesive base coat is sometimes applied. The base coat contains minimal amount of VOC and HAP. If basecoat is applied, the oven will stay in collect mode and solvent laden air (SLA) goes to the RTO. This A-oven can manually be switched to atmosphere but will also automatically switch to RTO if LEL's of 10% or more are detected. This material usage is included in the VOC and HAP calculations.

The B-Unit Hood where solvent based adhesive coatings are applied and the B-Unit Oven emissions are vented to the SRS while the C-Ovens (C1, C2 and C3 ovens) emissions are vented to the RTO. The LEL for all oven emissions are monitored. The static pressures for these ovens are monitored to verify capture efficiency of the control equipment. Similarly the vents for these ovens are also monitored to verify bypass. The ovens are electrically heated.

Coating Line 4: %LEL

R12N – Not operating	**A1 OVEN- 6**	**B STACK = 26**
R1Stack- Not operating	**A1 STACK – 10**	**B OVEN = 20**

B1 OVEN = 20	B2 OVEN = 26	B3 OVEN = 38
B1 STACK = 53	B2 STACK = 27	B3 STACK = 17

Next I inspected Coating Line 1. It was operating at the time of my inspection. It has a single hood for release coat/silicone coat (R-unit hood) and base coat (A-unit hood). The emissions from the R-Unit Hood and A Unit Hood are uncontrolled and those emissions are vented to the atmosphere. The R-unit Oven/A-unit Oven emissions are always vented to the RTO unless the operator puts the A/R-oven in bypass mode. While in bypass mode the coater will automatically switch to RTO collect if SLA is detected at 10% or more LEL. B-Unit Hood where solvent based adhesive coatings are applied and the B-Unit Oven emissions are vented to the SRS while the C-Ovens (C1 and C2 ovens) emissions are vented to the RTO. The Exit oven emissions are vented to the atmosphere. The ovens are electrically heated.

Coating Line 1: %LEL

A-Oven- Not operating	C1D1 = 5; B1 Oven – 40,	B1 STACK = 30
A-Work Station – Not operating	B2 Oven- 38, B2 STACK = 30,	B3 Oven = 20
B3 STACK = 18,	C1 D2 = 8, C1 STACK = 6	

Next I inspected the EUCOMPOUNDING. In this Banburry process the natural rubber (301L) is grounded into smaller pieces and mixed with dry powder fillers, and zinc oxide, to produce dry stocks. The process is controlled by two baghouses (north and south). They operate the process three shifts a day and five to six days per week. During the inspection, I observed that differential pressures were 2" WC for the South Shaker baghouse and 1"WC for North Shaker baghouse. The process was operating at the time of my inspection. The operators usually shake the bags during second shift. They keep logs of the pressure drop readings before and after each shake.

Next, I visited the Wet Mix area. In this process, initially ground natural rubber, antioxidants, stabilizers and resins are added to the mixers. The exhaust is vented through a dust fan to the atmosphere. Next nitrogen is purged through the mixers to reduce the oxygen concentration to avoid fire hazard. Next solvent addition is added. The solvent emissions from each mixer are controlled using a water cooled condenser. The condensed solvent goes back to the mixers. The mixed materials are then transferred to the churns for further high speed mixing to make the adhesive. Curing materials may be added to the churns. Nitrogen blanket is applied to each churn to remove oxygen in order to reduce fire hazard. The adhesive is transferred to totes. The facility has 3 mixers (No. 4, 5, &6) and five churns (No.3, 4, 5, 6, &10). After the mix is transferred, each mixer is dried using steam and the exhaust is vented through dust fan to the atmosphere.

In the WHIP room, additives (curing agents and catalysts) are added to the adhesive totes to obtain the correct specifications. The totes are placed on WHIP stand with large WHIPs. The adhesive totes are then connected to each coating lines. The facility has two large WHIPs and three small WHIPs. Ms. Oakley explained to me that the totes are covered while whipping and when the process is complete the employee goes up on the stand and takes a sample. During this process of collecting samples, the tote covers are opened and solvent vapors are released in the room. WHIP room emissions are included in the emission calculations.

The totes are cleaned in the Tote Cleaning Stand using toluene. It is a closed loop system. The spent solvent is reused in the wet mix process as required. I advised Melissa to have the cover of the wash tank closed at all the time when possible. I also inspected a parts washer located in that area. The cover was kept closed and the procedures were posted nearby. The cleaning solvent (Toluene) is recycled through a surge tank.

Next we visited the new SAMR extruder process. We also visited the locations where the rubber grinding equipment and solvent storage tanks are installed. The process was not operational.

Next we inspected the new pilot line which is a combination of adhesive manufacturing process and coating line. They told me it is not operational yet.

Next I inspected the regenerative thermal oxidizer (RTO) which controls VOC emissions from the Line 1-R or A Oven, Line 1- C Ovens, Line 4-A Oven, Line 4-C ovens, Line 3 Dryer 1, Line 3-Dryer 5 and the pilot line. The RTO contains 3 chambers which aids in the regeneration of heat. The solvent laden process exhaust travels through one of the chambers, warms up through heat exchange, undergo thermal incineration and cools down through another chamber and vented out through the stack. The third chamber is in "STANDBY" mode during this process. The combustion temperature is continuously recorded both electronically an on the paper chart. I walked around the RTO system. I did not observe any visible emissions from the RTO stack. The external structure of the RTO appears to be in good condition with no obvious deformities, leaks, or other irregularities. RTO Temperature: Burners were at 1469°F and 1455°F.

Next I inspected the solvent recovery system (SRS). The solvent laden exhaust air initially goes through filters and coolers to remove any particulates and to reduce the temperature for adsorption. Then the air goes three of the four carbon beds. While three of the four beds are adsorbing, the other one will be desorbing. The temperature and VOC concentration of the exhaust from carbon beds are monitored. The VOC concentration in the exhaust determines which bed is absorbing and desorbing. The beds are desorbed using steam. The condensed steam and solvents are decanted. From the decanter the toluene (solvent) goes to the toluene tank and the water goes to the water tank. From the toluene tank toluene is metered (2 meters in series) and stored in one of the two underground storage tanks. I walked around the SRS system. Each bed has an exhaust vent. I did not observe any visible emissions from the vents. The external structure of the SRS appears to be in good condition with no obvious deformities, leaks, or other irregularities.

The solvent recovered is measured by two meters connected in series. The readouts for these meters are located inside the control room. The operators read the meters at 1 am daily.

The facility continuously monitors the VOC concentration in the SRS exhaust and is used to step the process ahead. These readings are not recorded. The instantaneous readouts from SRS control:

183 bed	120 bed	121 bed	116 bed	
101 Stack	102 Stack	116 Stack	120 Stack	
0	0	0	0	ppm Stack Emissions

Mr. Smith later explained that the exhaust concentrations read "0 ppm" because the analyzer is "locked out".

FT#1: 16578.150 gallons
FT#2: 16580.389 gallons

Line 1- Collect; Line 4-Collect; L3D4- VENT; L3D3-VENT; L3D2- VENT

Mr. Smith informed me that Line 3 was not operating at that time and that is why the L3 dryers were shown in "vent".

Next I inspected the pilot line and the paint booth. Ms. Oakley told me that they haven't used the paint spray booth for long time. The filters seemed wrinkled, dirty and out of place. I advised them to have the filters replaced by new filters, so that someone won't accidentally use the booth with improperly installed filters. He agreed to comply with my suggestion soon. The pilot line uses solvent based adhesive. It is used 2- 3 times per week and 8 hours per day. The pilot line or the paint booth was not being used at the time

of my inspection. The paint booth did not appear to have used for some time. They are using a paper saturator, about 1-2 times per month.

I also inspected the parts washer in the maintenance area. The cover was closed and the procedure was posted. Later I verified that the Coating Line 3 was not operating.

Facility uses Compliance Monitoring System (CMS) which includes various Continuous Parameter Monitoring System (CPMS) required to monitor pursuant to 40 CFR 63.3350(e). The CPMS monitors RTO temperature (instantaneous, hourly and 3-hour average), Liquid (solvent) flow from the SRS, damper positions for the oven/dryers/hoods (vent/collect), baghouse differential pressures, vent static pressures, and dryer/oven LEL.

Facility keeps a database for coating information, raw material information, product information and VOC calculations. A product refers back to the coating and coating will include the materials used. They know how much coated and use this data to calculate the lb VOC/gallon coating, or solids, etc.

During a post inspection meeting Ms. Oakley informed me that they did not have any recent RTO malfunctions.

EUCOMPOUNDING:

The baghouses are shaken every 2 hours and pressure differential readings are taken every shift. The audible alarm is set for above 3"WC. The collected dust is reused in the process. In the company's Preventive Maintenance Plan (PMP) for the baghouses the pressure drop range is was identified as from 0.75"WC to 3.0"WC. The company keeps records of the pressure drop readings data. Review of this data shows that the pressure drop was within the range. The shake outs are still done manually.

FGCOATINGPROCESS:

The flexible group includes three web coating lines (Line 1, Line 3 and Line 4) and one pilot web coating line. The three web coating lines are controlled by a vapor-phase carbon control adsorption solvent recovery system (SRS) and a regenerative thermal oxidizer (RTO) unit. The adhesive coating hoods and dryer zones emissions are controlled by the SRS and cure zone emissions are controlled by the RTO. When ever the water based coatings (silicone coatings) are used, the emissions are uncontrolled and vented to the atmosphere. The static pressures for the oven/dryer vents which are controlled by the RTO is monitored continuously.

The pilot line is used for testing the coatings. It was not in-use at the time of my inspection. It is located in a separate room than the other coating lines. The emissions from the pilot line are controlled by RTO.

FGRULE287:

This covers a spray booth which is located in the same building as the pilot line. The company uses very little coating and keeps records of the coating usage. They use this to test the "painter's tape". The booth was not in use at the time of our inspection.

FGCOLDCLEANERS:

The facility has five cold cleaners (soak tanks) onsite. I inspected four of these cold cleaners. The covers for the parts washers near the coating lines were closed. Mr. Deitering told me that the parts washer in the maintenance uses mineral spirit. He informed me that they keep the cover for all the soak tanks closed and the operating procedures are posted. Toluene is used as the cleaning solvent. The spent solvent is used in the adhesive making process.

Compliance Review:

EUCOMPOUNDING:

The process emissions are controlled by two fabric filter baghouses. The facility has installed the pressure drop indicators and has been monitoring, and keeping records of the pressure drops across the baghouse as required by the ROP. The records show the pressure drops are within the established ranges. Also see discussion above under EUCOMPOUNDING.

FGCOATINGPROCESS:

The web coating lines comprise the affected source that is subject to the Paper and Other Web Coating (POWC) Maximum Achievable Control Technology (MACT) Standard (40 CFR Part 63, Subpart JJJJ). The flexible group is an existing web coating affected source for the purposes of the POWC MACT standard.

The VOC emissions are limited to 4.79 pounds per gallon of solids applied based on a 24-hour averaging period. The emission calculations (Intertape Emissions Database-Daily Summary Sheet) show that the VOC emissions from each coating line comply with this emission limit. Data reviewed September1, 2014-August 31, 2015.

The VOC emissions from EUPILOT-LINE are limited to 32.87 pounds per hour and 65.74 tons per year. The emission calculations (2015 Pilot line VOC calculations) for the pilot coater show that the VOC emissions are well below the emission limits. The Submitted records were for January through August 2015. The total HAP emissions for January through August 2015 were about 38 pounds.

The POWC MACT provides several emission limit options for the facility to comply with. Facility chose the HAP limit of "no more than 20% of the mass of coating solids applied". The monthly calculations (Intertape Emissions Database-Daily Summary Sheet) show that the facility is in compliance with the emission limit. The highest recorded HAP emissions were 9.5% of the solids coated in June 2015.

The % LEL of A-Unit Oven on EUCOATINGLINE1 and A-Unit Oven on EUCOATINGLINE4 are monitored continuously and are controlled by RTO when the %LEL is above 10%. The cure zone emissions from the EUCOATINGLINE1, EUCOATINGLINE3 and EUCOATINGLINE4 are controlled by the RTO. The facility keeps a minimum temperature of 1400°F in the combustion chamber of the RTO. The SRS and the RTO are installed in a satisfactory manner.

The facility conducted the testing for capture efficiency of the VOC capture system and the destruction efficiency of the RTO during May 9, 10, 11 & 12, 2012. On May 9th, they performed destruction efficiency testing operating all three lines. However, the capture efficiency testing was done on May 10-12 by operating individual coating lines. AQD received the test report on July 26, 2012.

Facility makes its own adhesives. VOC emissions are mostly HAP and Toluene is predominant HAP in the formulation. Ms. Oakley informed me that they don't perform USEPA Method 24 for VOC content, but they are using technical data sheet for the information. It is keeping records as necessary.

During the pre-inspection meeting, we discussed that they need to monitor and record the static pressures to verify continuous compliance with the capture efficiency.

Mr. Smith told me that the purity of the collected solvent is 100% because the solvent is metered from the top of the toluene tank which decanted from the decanter tanks. So they are not performing the purity check as required in the ROP (SC V.4).

Facility keeps separate records of the daily usage rate of all materials used in EUCOATINGLINE1, EUCOATINGLINE3 and EUCOATINGLINE4.

Facility calculates and records pounds of VOC per gallon of applied coating solids on each coating line, based on a 24-hour averaging period (Intertape Emissions Database-Daily Summary Sheet).

For EUPILOT-LINE, they informed me that they calculate and records the pound per hour VOC emission rates on a monthly basis and tons per year.

Facility calculates and keeps records of the cure zone emissions from the three coating lines. The emissions are reported monthly to AQD.

Facility continuously monitors and keeps records of the RTO combustion zone temperature. It is required to maintain a minimum combustion temperature above 1400oF calculated based on 3-hour average. The facility reported that the 3 hour average temperature was below 1430°F on few days in February and Mach 2015. The records show that the RTO temperature was below 1400°F. To remedy this issue, the facility replaced the actuator and the universal joint. From the temperature records collected after the July repair the problem appears to be corrected.

It also monitors the %LEL A-Unit Ovens, on a continuous basis. The coating lines are equipped with alarms which will sound if the %LEL of the exhaust gases vented to RTO from A-Unit oven exceeds 10%. Facility maintains RTO and SRS as required by the ROP and implements the requirements of the Malfunction Abatement Plan.

Facility keeps daily records of the solvent usage in the three coating lines and calculates the pounds of VOC per gallon of solids applied on each coating line, based on a 24-hour averaging period. The calculated results show compliance with the permit limit (4.79 lb/gallon coating solids). The facility calculates the SRS recovery efficiency as required.

The combustion temperature is the operating parameter to monitor for the continuous compliance of the RTO. The facility calculates 3-hour averages of the operating temperature. Records review (2015 Chart Recorder History) shows that the facility operated the RTO Retention Chamber temperature was above 1400oF while the coating lines were operating except as noted above. Mr. Smith told me that the facility is keeping records of the thermocouple calibrations, malfunctions, if any and repairs. The facility appears to be in compliance with the requirements of Special Conditions 13 and 16.

Facility's coating lines have never-controlled and always-controlled workstations. The work stations are "always controlled" while solvent based coatings are used, but "never-controlled" while water based coatings are used. The work stations for release coat are not controlled. It has identified "static pressure" of the capture system as the operating parameter to be monitored to ensure the capture efficiency. It is monitoring the static pressure on a continuous basis and calibrates (valve monitoring) on a monthly basis.

Facility is keeping records of the malfunctions, maintenances, actions, etc. as required. It submits these information with semi-annual certification report and Start up, shut down and malfunction report.

Mr. Smith informed me that he facility keeps records of CMS measurements, audits, calibrations, and malfunctions. The facility also keeps records of all reports, notifications and each applicability determination. The facility is not using a continuous emission monitoring system (CEMS) to verify SRS efficiency. The facility maintains records for the control device and capture system operating parameters, keeps formulation data to calculate VOC and HAP content, capture and control efficiencies, material usage, organic HAP usage, volatile matter usage, and coating solids usage, etc.

The facility has installed two meters in series to measure the accumulative solvent flow from the SRS

system. Facility is keeping records of the liquid-liquid material balances performed in accordance with 40 CFR 63.3370.

Mr. Smith informed me that they are keeping computerized preventive maintenance (MAINTIMIZER) program for work schedules.

The facility has not been keeping a manual checklist of all monitoring and preventive maintenance items. They agreed to keep the checklist for the future.

They told me that they are keeping records of VOC solvents purchased, VOC solvents in stock, amount of adhesive in stock, and amount of toluene based adhesive, IPA based adhesive and water based adhesive. Facility purchased about 225,052 gallons of Toluene and 44,986 gallons of IPA during Jan-August 2015.

The facility is keeping records pounds of VOC per gallon of coating, and daily hours of operation of each coating line.

Facility has submitted initial notification, performance testing notification, performance test report, initial compliance status, semi-annual compliance reports, start up, shut down, malfunction reports, as required.

Facility has submitted a written Start up, Shut down and Malfunction Abatement Plan for the source, control and monitoring system in May 1999.

Facility keeps a written Startup, Shutdown, Malfunction Plan and Continuous Monitoring System quality control program in file.

Facility uses the add-on controls option to show compliance with the emission limits. During the performance test, the capture efficiency and control efficiency were calculated. It calculates the emission limit on a monthly basis, as required.

The calculations show more than 95% capture and control efficiency on a monthly basis. The calculations show that the organic HAP emissions are less than 0.20 kg/kg coating solids.

The facility has demonstrated initial compliance for each capture system and the RTO through performance tests and demonstrates continuing compliance through continuous monitoring of capture system and control system operating parameters as required. The performance tests are required to be conducted every five years.

Facility demonstrates compliance with the emission limit using two control devices. The SRS uses material balance to demonstrate compliance and the web coating lines have always controlled and never controlled work stations. Facility uses the Equation 1 in Appendix 10 of the ROP to show compliance with the HAP emission limits.

FGBOILERMACT

Existing boiler or process heater with design capacity greater than 10 MMBTU/hr to burn gas 1 fuels subcategory: The SRS boiler is the affected facility. The source needs to be in compliance with the requirements by January 31, 2016. 40 CFR 63, Subpart DDDD requires that the facility to conduct an annual tune up and one time energy assessment. Mr. Smith told me that they will be in compliance with the requirements by the compliance date.

FG-RICEMACT

The EUGENERATOR is affected source. They are keeping records of the hours of operation and conducting annual maintenance.

FGSTORAGETNKS:

Facility stores recovered toluene in the two 20,000 gal tanks. The purchased toluene is also stored in these storage tanks. The facility is keeping records are required. The records were not verified during the inspection.

FGRULE290

EU-RDPILOT-LINE is included in this flexible group. This pilot line is not operational yet. So compliance is not determined.

FGRULE287(c):

Facility keeps coating usage rate on a monthly basis. I instructed Ms. Oakley to keep clean and properly installed filters. On 9/11/2015, she informed me, via email, that they had replaced the filters. In 2014 the facility used only about 29 ounces and in 2015 about 15 ounces of coatings. The facility appears to be in compliance with the usage and emission limit requirements.

FGCOLDCLEANERS:

The facility has five soak tanks. It appeared that they were in compliance with the requirements. The cold cleaners I inspected were kept covered. The procedures are posted near the cleaners.

Discussion:

The facility needs to update the Continuous Monitoring System Quality Control Program required by 40 CFR 63.8(d) to further address the deviations related to oven static pressure going below the range. The program should include corrective actions and preventive maintenance, etc. The facility should submit the updated program to AQD for approval by December 1, 2015.

AQD Order of Consent AQD No. 10-1997 is included in the ROP. AQD Consent Order No. 28-2008 requires the facility to comply with the requirements of the current ROP. I did not verify compliance with PTI No. 81-14 because the process is not operational yet.

Conclusion:

Based on the submitted calculations, the facility appears to be in compliance with the monthly MACT limit and the coating VOC limit. A CD containing the emission calculations is included for review.

NAME Sebastian Kallumkal DATE 9/22/15 SUPERVISOR CTE