

1.0 Executive Summary

JLB Industries, LLC completed a compliance environmental testing program during the week of December 7, 2020 in the paint shop at the Ford Michigan Assembly Plant (MAP) facility located in Wayne, Michigan. The testing program included Transfer Efficiency (TE) and Capture Efficiency (CE) testing of the 3-Wet spraybooths and ovens. Determination of TE and CE were conducted in accordance with all applicable procedures contained in USEPA document Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations and with 40 CFR Chapter 1, Appendix A to Subpart IIII of Part 63. The test results will be used to demonstrate compliance with Auto MACT requirements and in monthly emissions compliance calculations.

Transfer Efficiency values were derived for the Ford Ranger model, which currently accounts for the majority of production volume at the facility. Additional testing is planned after the Bronco model launches. Personnel from the paint shop, Ford environmental staff and JLB Industries, LLC conducted the testing. These groups worked together at each stage of testing to ensure that the results were representative of production conditions.

JLB Industries used highly accurate weighing systems to determine the vehicle and panel weights before and after coating application. Calibrated volumetric flow meters, located on each applicator, were used to measure paint usage.

Material samples were collected from the paint circulation tanks directly after vehicle spray out. Determination of percent solids by weight and density was performed by RTI Laboratories, Inc. located in Livonia, Michigan.

Table 1 – Testing Results Summary

Tested Coating	Solids Transfer Efficiency (%)
E1 3-Wet System (Prime, Basecoat and Clearcoat)	82.9%
E2 3-Wet System (Prime, Basecoat and Clearcoat)	81.8%
E1 & E2 Average	82.35%



JLB Industries, LLC

Tested Coating	Booth Capture Efficiency	Oven Capture Efficiency	Total Capture Efficiency
Enamel 2 Prime	79.0%	10.9%	90.0%
Enamel 2 Basecoat	70.8%	13.7%	84.5%
Enamel 2 Clearcoat	63.2%	23.3%	86.4%
Enamel 1 Prime	74.9%	12.2%	87.2%
Enamel 1 Basecoat	76.2%	13.4%	89.6%
Enamel 1 Clearcoat	64.4%	23.0%	87.5%

2.0 Introduction

JLB Industries, LLC (JLBI) was contracted by Ford Michigan Assembly Plant (MAP) to perform Transfer Efficiency (TE) and Capture Efficiency (CE) testing program on the 3-Wet Systems in the paint shop at the Michigan Assembly Plant located in Wayne, Michigan. This testing was conducted on the Ford Ranger model during the week of December 7, 2020.

3.0 Sampling and Analytical Procedures

Transfer Efficiency Test

Transfer Efficiency testing was conducted in the Enamel 1 and Enamel 2 (E1 & E2) 3-Wet Spraybooth where Light Gray Prime, Absolute (Shadow) Black Basecoat and Clearcoat were applied. Applicator and environmental conditions were monitored to ensure that the testing accurately reflected production conditions. Measured parameters included: Vehicle weight gain, material usage, material analysis (percent solids by weight and density), applicator settings, film build and oven heat settings.

A total of five vehicle bodies were tested in each system. Three vehicles were processed as normal production vehicles for the test, while two vehicles were dedicated as no-paint, control vehicles. All units were production vehicles with sealer.

An on-line vehicle weigh station (VWS) was constructed to measure the weight of the test units before and after each painting process. Test vehicles were routed to a dedicated conveyor spur. A fixed stop was secured to assure repeatable positioning of the vehicles. Test vehicles were lifted free from their carriers by four lift-table mounted scale bases. Ultra-high molecular weight (UHMW) plastic blocks were strategically placed on the scale bases to lift the vehicle at the center of gravity locations. The UHMW blocks minimized friction loading on vehicles and scale bases.

Vehicle weights were measured several times and recorded. All test vehicles were weighed with production fixtures (door hooks and hood props) installed. The vehicle weigh station scales were calibrated using Class-F calibration weights conforming to the National Bureau of Standards handbook 105-1. A one or two-pound avoirdupois, Class F stainless steel weight was added periodically during pre- and post-process weighing to verify scale linearity.

Coating thickness was measured on a representative test vehicle to verify paint film-build was within the production specification. The data was taken with a handheld elcometer gauge.

Coating material usage was monitored via volumetric flow measurement devices located on each applicator. A verification of several representative applicators was performed by MAP personnel to ensure accurate usage measurement. Material samples of applied coatings were collected from the respective systems directly after testing. Samples were

sent to RTI Laboratories Inc. in Livonia, Michigan, for analysis to determine density by ASTM D1475 and weight solids content by ASTM D2369 (referenced in EPA Method 24). The laboratory results were used in calculating the Transfer Efficiency and Capture Efficiency values.

Production vehicles with paint shop sealer were prepared with e-coat and processed through the E1 and E2 3-Wet Spraybooths. The test sequence for each booth was:

1. Test Unit ID TE 1
2. Test Unit ID TE 2
3. Test Unit ID TE 3
4. Test Unit ID TE 4 (No-paint)
5. Test Unit ID TE 5 (No-paint)

Test vehicles were baked and routed back to the VWS for post-weights.

Capture Efficiency Tests

Capture Efficiency testing was performed on both Enamel 1 and Enamel 2 systems. A panel weigh station (PWS) was assembled at a location near the 3-Wet Spraybooth. A precision balance with measurement capability to 0.001 gram was placed on an isolation platform inside an enclosure to minimize vibration and air movement.

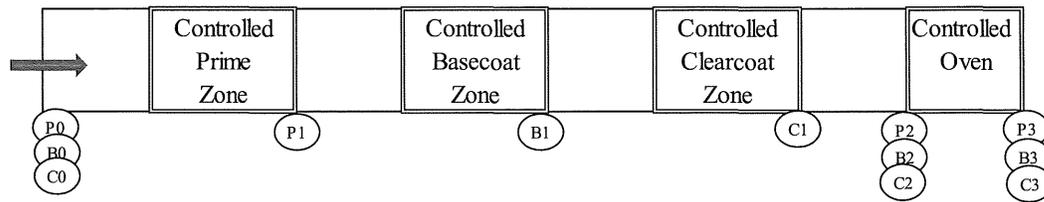
The testing conformed to the methods described in ASTM 5087-02 for solvent borne coatings. Capture Efficiency values for the controlled oven and spraybooth zones were calculated using the procedures outlined in the 40 CFR, Part 63.

All test panels were placed on vehicle bodies and processed with normal production spray programming.

Four electrocoated panels were used for each of the tests. Each group of test panels was weighed in several locations (see panel test diagram) to determine the relative distribution of VOC that is released in the controlled spray zones and bake oven. The panels were attached to test vehicles by magnet, which allowed for removal of the wet panels with minimal disturbance to the coating during handling. Panel mounting locations were chosen to achieve a representative coating film based on the observation of normal vehicle production.

Before the panels were coated, they were marked (1, 2, 3, 4, blank) and weighed to establish the initial unpainted panel weights (P0). The panels were then attached to a test vehicle and routed through the Spraybooth. After coating, upon exiting the controlled spraybooth zone, the panels were carefully removed from the test vehicle and brought to the balance for weighing (P1). The panels were weighed again immediately before entering the bake oven (P2). The panels were then placed on the test vehicle for travel through the curing oven. Upon exiting the oven, the panels were allowed to cool and then weighed a final time (P3).

Diagram 1 – Panel Testing Diagram



4.0 Test Equipment and Calibration

Vehicle Weigh Station (VWS)

A dedicated vehicle weigh station (VWS) equipped with four 1,000 lb. capacity scale bases was used to obtain pre- and post-process vehicle weights. The VWS is accurate to better than 0.05 pounds.

The scales were calibrated as directed by the operating instruction manual. Scales were powered up and exercised by placing 300 pounds of Class F calibration weights on each scale platform. Then, the VWS was calibrated with 800 pounds of Class F calibration weights. VWS linearity was checked using a one or two-pound, Class F stainless steel calibration weight. The two-pound weight was also added to each test vehicle during pre- and post-process weighing to verify scale linearity.

Material Usage

Coating material usage was monitored via volumetric flow measurement devices located on each applicator. A verification of several representative applicators was performed by MAP personnel before testing to ensure accurate usage data. Paint usage was measured at each applicator in a graduated cylinder and compared to the expected volume. Verification data is included in section 7 of this report.

A sample of each material was taken after each test and analyzed by RTI Laboratories. These values were used in calculating the paint solids sprayed and the transfer efficiency for each type of calculation. ASTM Method D-2369 was used to determine paint solids. ASTM Method D-1475 was used to determine paint density.

Panel Weigh Station

A panel weigh station (PWS) with measurement capability to 0.001 gram was used to measure panel weights. The balance was warmed up and then calibrated with a 300 gram test weight. The balance was tested with 50, 10 and 1 gram weights before commencing weighing operations. A blank panel weight was measured at the beginning of the testing program and again at the time of each subsequent panel weight measurement. The balance was placed on an isolation platform and inside an enclosure to minimize vibration and airflow at the measurement point.

5.0 Discussion of Test Results

There were no significant disruptions to the testing process. Representative coatings were chosen for testing based on the production volume and the application process.

6.0 Summary of Results

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Table 2 - E1 3-Wet Transfer Efficiency Calculation Summary
Ford MAP, December 2020

Vehicle ID	Vehicle Weight Gain (lb.)	Prime Sprayed (gal)	Basecoat Sprayed (gal)	Clearcoat Sprayed (gal)
Variable:	VWG	PPS	BCPS	CCPS
Calculation:	(W2-W1)			
159	4.64	0.357	0.588	0.697
266	4.25	0.357	0.588	0.697
210	4.63	0.357	0.588	0.671
Average:	4.51	0.357	0.588	0.689
AVWG:	5.90	AVWG=(avg VWG-SWL)		

Material	Avg. Paint Sprayed (gal)	Coating Density (lb/gal)	Weight Solids Fraction	Avg. Solids Sprayed (lb.)	Transfer Efficiency (%)
Variable:	APS	CD	WSF	SS	TE
Calculation:	(Avg PS)	(Method 24)	(Method 24)	(APS*CD*WSF)	(AVWG/SS)
Prime	0.357	9.25	0.5630	1.86	
Basecoat	0.588	8.31	0.4720	2.30	
Clearcoat	0.689	8.35	0.5130	2.95	
				7.11	82.9%

Control Vehicle Sealer Weight Loss

Vehicle ID	Vehicle Weight Gain (lb.)
Variable:	SWL
Calculation:	(W2-W1)
Control 1	-1.53
Control 2	-1.26
Average	-1.39

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Table 3 - E2 3-Wet Transfer Efficiency Calculation Summary
Ford MAP, December 2020

Vehicle ID	Vehicle Weight Gain (lb.)	Prime Sprayed (gal)	Basecoat Sprayed (gal)	Clearcoat Sprayed (gal)
Variable:	VWG	PPS	BCPS	CCPS
Calculation:	(W2-W1)			
97	4.52	0.370	0.598	0.703
131	4.76	0.370	0.598	0.701
141	4.69	0.370	0.621	0.713
Average:	4.66	0.370	0.606	0.705
AVWG:	5.97	AVWG=(avg VWG-SWL)		

Material	Avg. Paint Sprayed (gal)	Coating Density (lb/gal)	Weight Solids Fraction	Avg. Solids Sprayed (lb.)	Transfer Efficiency (%)
Variable:	APS	CD	WSF	SS	TE
Calculation:	(Avg PS)	(Method 24)	(Method 24)	(APS*CD*WSF)	(AVWG/SS)
Prime	0.370	9.65	0.5570	1.99	
Basecoat	0.606	8.44	0.4640	2.37	
Clearcoat	0.705	8.03	0.5190	2.94	
				7.30	81.8%

Control Vehicle Sealer Weight Loss

Vehicle ID	Vehicle Weight Gain (lb.)
Variable:	SWL
Calculation:	(W2-W1)
Control 1	-1.59
Control 2	-1.05
Average	-1.32

**Table 4 -- Enamel 2 Prime Booth VOC Capture Efficiency
Ford MAP, December 2020**

Sample	Blank Panel Weights (g)	Wet Panel Weights - Control Zone Exit (g)	Panel Weights - after bake (g)	Weight of Coating Solids Deposited (g)	Weight of VOC remaining after zone (g)	Weight of VOC remaining per Weight Solids Deposited (g)	Mass Fraction Solids	Mass Fraction VOC in Coating	VOC fraction remaining on Panel after Zone	Section Capture Efficiency (%)
Variable	P0	P1	P3	W_{sdep}	W_{rem}	P_m	W_s	W_{VOC}	P_{VOC}	CE
Formula				$P3-P0$	$P1-P3$	W_{rem}/W_{sdep}			$(P_m)(W_s)/(W_{VOC})$	$1-P_{VOC}$
P1	186.683	187.903	187.740	1.057	0.163	0.154	0.5630	0.4370	0.210	79.0%
P2	186.641	187.772	187.607	0.966	0.165	0.171				
P3	186.118	187.198	187.050	0.932	0.148	0.159				
P4	186.214	187.394	187.225	1.011	0.169	0.167				
Average						0.163				

**Table 5 -- Enamel 2 Basecoat Booth VOC Capture Efficiency
Ford MAP, December 2020**

Sample	Blank Panel Weights (g)	Wet Panel Weights - Control Zone Exit (g)	Panel Weights - after bake (g)	Weight of Coating Solids Deposited (g)	Weight of VOC remaining after zone (g)	Weight of VOC remaining per Weight Solids Deposited (g)	Mass Fraction Solids	Mass Fraction VOC in Coating	VOC fraction remaining on Panel after Zone	Section Capture Efficiency (%)
Variable	P0	P1	P5	W _{sdep}	W _{rem}	P _m	W _s	W _{VOC}	P _{VOC}	CE
Formula				P5-P0	P1-P5	W_{rem}/W_{sdep}			$(P_m)(W_s)/(W_{VOC})$	1-P _{VOC}
B1	186.544	187.450	187.231	0.687	0.219	0.319	0.4720	0.5280	0.292	70.8%
B2	186.312	187.212	186.991	0.679	0.221	0.325				
B3	186.195	187.238	186.981	0.786	0.257	0.327				
B4	186.874	187.828	187.589	0.715	0.239	0.334				
Average						0.326				

**Table 6 -- Enamel 2 Clearcoat Booth VOC Capture Efficiency
Ford MAP, December 2020**

Sample	Blank Panel Weights (g)	Wet Panel Weights - Control Zone Exit (g)	Panel Weights - after bake (g)	Weight of Coating Solids Deposited (g)	Weight of VOC remaining after zone (g)	Weight of VOC remaining per Weight Solids Deposited (g)	Mass Fraction Solids	Mass Fraction VOC in Coating	VOC fraction remaining on Panel after Zone	Section Capture Efficiency (%)
Variable	P0	P1	P3	Wsdep	Wrem	P_m	W_s	W_{VOC}	P_{VOC}	CE
Formula				$P3-P0$	$P1-P3$	W_{rem}/W_{sdep}			$(P_m)(W_s)/(W_{VOC})$	$1-P_{VOC}$
C1	185.892	188.415	187.773	1.881	0.642	0.341	0.5130	0.4870	0.368	63.2%
C2	185.761	188.039	187.431	1.670	0.608	0.364				
C3	185.922	188.081	187.528	1.606	0.553	0.344				
C4	186.124	188.293	187.732	1.608	0.561	0.349				
Average						0.350				

**Table 7 -- Enamel 2 Prime Oven VOC Capture Efficiency
Ford MAP, December 2020**

Sample	Blank Panel Weights (g)	Wet Panel Weights - Before Bake (g)	Panel Weights - after bake (g)	Weight of Coating Solids Deposited (g)	Weight of VOC available for abatement (g)	Weight of VOC available per volume of coating solids (lb/gal)
Variable	P0	P2	P3	W_{cos}	W_a	CL
Formula				$P3-P0$	$P2-P3$	$(W_a/W_{cos}) * D_{cos}$
P1	186.683	187.832	187.740	1.057	0.092	0.90
P2	186.641	187.732	187.607	0.966	0.125	1.34
P3	186.118	187.148	187.050	0.932	0.098	1.09
P4	186.214	187.322	187.225	1.011	0.097	1.00
Average				0.992	0.103	1.08

Material Properties

Sample	Coating Density (lb/gal)	Mass Fraction Solids	Volume Fraction Solids	Average Film Build Thickness (mil)	VOC mass fraction	Solids Density (lb/gal)
Variable	W_c	W_s	V_s	mil	W_{voc}	D_{cos}
Formula						$(W_s * W_c) / V_s$
Prime	9.25	0.5630	0.5020	0.88	0.4370	10.37

Capture Efficiency

Mass Fraction VOC in Coating	Coating Density (lb/gal)	Mass VOC per Volume Coating (lb/gal)	Transfer Efficiency (%)	Volume Fraction Solids	Volume Solids Deposited per Volume Coating Sprayed	Panel Test Result (lb VOC/ gal Solids)	Oven VOC Capture Efficiency (%)
W_{voc}	D_c	VOC	TE	V_s	V_{sdep}	P	CE
		$(D_c)(W_{voc})$			$(V_s)(TE)$		$(P)(V_{sdep})(100)/(VOC)$
0.4370	9.25	4.042	81.8%	0.5020	0.411	1.08	10.9%

**Table 8 -- Enamel 2 Basecoat Oven VOC Capture Efficiency
Ford MAP, December 2020**

Sample	Blank Panel Weights (g)	Wet Panel Weights - Before Bake (g)	Panel Weights - after bake (g)	Weight of Coating Solids Deposited (g)	Weight of VOC available for abatement (g)	Weight of VOC available per volume of coating solids (lb/gal)
Variable	P0	P4	P5	W _{cos}	W _a	CL
Formula				P5-P0	P4-P5	$(W_a/W_{cos}) * D_{cos}$
B1	186.544	187.371	187.231	0.687	0.140	1.80
B2	186.312	187.113	186.991	0.679	0.122	1.58
B3	186.195	187.115	186.981	0.786	0.134	1.50
B4	186.874	187.730	187.589	0.715	0.141	1.74
Average				0.717	0.134	1.65

Material Properties

Sample	Coating Density (lb/gal)	Mass Fraction Solids	Volume Fraction Solids	Average Film Build Thickness (mil)	VOC mass fraction	Solids Density (lb/gal)
Variable	W _c	W _s	V _s	mil	W _{voc}	D _{cos}
Formula						$(W_s * W_c) / V_s$
Basecoat	8.31	0.4720	0.4450	0.83	0.5280	8.81

Capture Efficiency

Mass Fraction VOC in Coating	Coating Density (lb/gal)	Mass VOC per Volume Coating (lb/gal)	Transfer Efficiency (%)	Volume Fraction Solids	Volume Solids Deposited per Volume Coating Sprayed	Panel Test Result (lb VOC/ gal Solids)	Oven VOC Capture Efficiency (%)
W _{voc}	D _c	VOC	TE	V _s	V _{sdep}	P	CE
		$(D_c)(W_{voc})$			$(V_s)(TE)$		$(P)(V_{sdep})(100)/(VOC)$
0.5280	8.31	4.388	81.8%	0.4450	0.364	1.65	13.7%

**Table 9 -- Enamel 2 Clearcoat Oven VOC Capture Efficiency
Ford MAP, December 2020**

Sample	Blank Panel Weights (g)	Wet Panel Weights - Before Bake (g)	Panel Weights - after bake (g)	Weight of Coating Solids Deposited (g)	Weight of VOC available for abatement (g)	Weight of VOC available per volume of coating solids (lb/gal)
Variable	P0	P2	P3	W _{cos}	W _a	CL
Formula				P3-P0	P2-P3	$(W_a/W_{cos}) * D_{cos}$
C1	185.892	188.253	187.773	1.881	0.480	2.25
C2	185.761	187.898	187.431	1.670	0.467	2.47
C3	185.922	187.972	187.528	1.606	0.444	2.44
C4	186.124	188.168	187.732	1.608	0.436	2.39
Average				1.691	0.457	2.39

Material Properties

Sample	Coating Density (lb/gal)	Mass Fraction Solids	Volume Fraction Solids	Average Film Build Thickness (mil)	VOC mass fraction	Solids Density (lb/gal)
Variable	W _c	W _s	V _s	mil	W _{voc}	D _{cos}
Formula						$(W_s * W_c) / V_s$
Clearcoat	8.35	0.5130	0.4850	2.09	0.4870	8.83

Capture Efficiency

Mass Fraction VOC in Coating	Coating Density (lb/gal)	Mass VOC per Volume Coating (lb/gal)	Transfer Efficiency (%)	Volume Fraction Solids	Volume Solids Deposited per Volume Coating Sprayed	Panel Test Result (lb VOC/ gal Solids)	Oven VOC Capture Efficiency (%)
W _{voc}	D _c	VOC	TE	V _s	V _{sdep}	P	CE
		(D _c)(W _{voc})			(V _s)(TE)		$(P)(V_{sdep})(100)/(VOC)$
0.4870	8.35	4.066	81.8%	0.4850	0.397	2.39	23.3%

**Table 10 -- Enamel 1 Prime Booth VOC Capture Efficiency
Ford MAP, December 2020**

Sample	Blank Panel Weights (g)	Wet Panel Weights - Control Zone Exit (g)	Panel Weights - after bake (g)	Weight of Coating Solids Deposited (g)	Weight of VOC remaining after zone (g)	Weight of VOC remaining per Weight Solids Deposited (g)	Mass Fraction Solids	Mass Fraction VOC in Coating	VOC fraction remaining on Panel after Zone	Section Capture Efficiency (%)
Variable	P0	P1	P3	W_{sdep}	W_{rem}	P_m	W_s	W_{VOC}	P_{VOC}	CE
Formula				$P3-P0$	$P1-P3$	W_{rem}/W_{sdep}			$(P_m)(W_s)/(W_{VOC})$	$1-P_{VOC}$
P1	187.036	188.115	187.933	0.897	0.182	0.203	0.5630	0.4370	0.251	74.9%
P2	186.021	187.118	186.934	0.913	0.184	0.202				
P3	186.406	187.452	187.287	0.881	0.165	0.187				
P4	187.157	188.300	188.120	0.963	0.180	0.187				
Average						0.195				

**Table 11 -- Enamel 1 Basecoat Booth VOC Capture Efficiency
Ford MAP, December 2020**

Sample	Blank Panel Weights (g)	Wet Panel Weights - Control Zone Exit (g)	Panel Weights - after bake (g)	Weight of Coating Solids Deposited (g)	Weight of VOC remaining after zone (g)	Weight of VOC remaining per Weight Solids Deposited (g)	Mass Fraction Solids	Mass Fraction VOC in Coating	VOC fraction remaining on Panel after Zone	Section Capture Efficiency (%)
Variable	P0	P1	P5	Wsdep	Wrem	P_m	W_s	W_{VOC}	P_{VOC}	CE
Formula				$P5-P0$	$P1-P5$	W_{rem}/W_{sdep}			$(P_m)(W_s)/(W_{VOC})$	$1-P_{VOC}$
B1	186.385	187.250	187.084	0.699	0.166	0.237				
B2	187.121	188.001	187.815	0.694	0.186	0.268				
B3	186.879	187.780	187.571	0.692	0.209	0.302				
B4	186.345	187.238	187.056	0.711	0.182	0.256				
Average						0.266	0.4720	0.5280	0.238	76.2%

**Table 12 -- Enamel 1 Clearcoat Booth VOC Capture Efficiency
Ford MAP, December 2020**

Sample	Blank Panel Weights (g)	Wet Panel Weights - Control Zone Exit (g)	Panel Weights - after bake (g)	Weight of Coating Solids Deposited (g)	Weight of VOC remaining after zone (g)	Weight of VOC remaining per Weight Solids Deposited (g)	Mass Fraction Solids	Mass Fraction VOC in Coating	VOC fraction remaining on Panel after Zone	Section Capture Efficiency (%)
Variable	P0	P1	P3	Wsdep	Wrem	P_m	W_s	W_{VOC}	P_{VOC}	CE
Formula				$P3-P0$	$P1-P3$	W_{rem}/W_{sdep}			$(P_m)(W_s)/(W_{VOC})$	$1-P_{VOC}$
C1 INT	185.752	187.047	186.753	1.001	0.294	0.294	0.5130	0.4870	0.284	71.6%
C2 INT	187.465	188.667	188.492	1.027	0.175	0.170				
C3 INT	187.516	188.784	188.459	0.943	0.325	0.345				
Average						0.270				
C1 EXT	187.988	189.658	189.140	1.152	0.518	0.450				
C2 EXT	185.235	187.181	186.708	1.473	0.473	0.321				
C3 EXT	185.738	187.653	187.182	1.444	0.471	0.326	0.5130	0.4870	0.385	61.5%
Average						0.366				

	cc	fraction
Interior Usage	739	0.291
Exterior Usage	1801	0.709

Capture Efficiency Average (%)
64.4%

Note: Clearcoat capture efficiency is the weighted average of interior and exterior.