

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

A936431166

FACILITY: Hutchinson Antivibration Systems, Inc		SRN / ID: A9364
LOCATION: 600 Seventh St., CADILLAC		DISTRICT: Gaylord
CITY: CADILLAC		COUNTY: WEXFORD
CONTACT: Al Gatt , HSE Coordinator		ACTIVITY DATE: 09/10/2015
STAFF: Rob Dickman	COMPLIANCE STATUS: Compliance	
SUBJECT: Scheduled inspection of this ROP subject source.		SOURCE CLASS: MAJOR
RESOLVED COMPLAINTS:		

Inspected this major source pursuant to MI-ROP-A9364-2014 issued late December of 2014 and Permit to Install Number 89-05G issued in May of 2015. This facility manufactures anti-vibration parts for the automotive industry. The majority of their business is molding rubber and adhering that rubber to metal parts. Following are the findings of the inspection by permit condition.

SOURCE-WIDE CONDITIONS

I. EMISSION LIMIT(S) – None listed

II. MATERIAL LIMIT(S) – None listed

III. PROCESS/OPERATIONAL RESTRICTION(S) – None listed

IV. DESIGN/EQUIPMENT PARAMETER(S) – None listed

V. TESTING/SAMPLING – None listed

VI. MONITORING/RECORDKEEPING – None listed

VII. REPORTING

1. Deviation reporting pursuant to the ROP has been performed in a timely and correct manner. Please see MACES for further details.

VIII. STACK/VENT RESTRICTION(S) – None listed

IX. OTHER REQUIREMENT(S)

1. The facility is currently under a Consent Order (Consent Order 7-2012) which requires them to obtain an ROP. MI-ROP-A9364-2014 was issued in December of 2014.

2. The permittee shall maintain a Malfunction Abatement Plan (MAP) for the equipment listed in this permit. This MAP was available for inspection by the AQD and continues to be under development.

EUROLLCOAT

1. A roll coat process with primer and adhesive application stations connected by a conveyor system. VOC emissions from the system are controlled by a regenerative thermal oxidizer.

I. EMISSION LIMIT(S) – None listed

II. MATERIAL LIMIT(S) – None listed

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste cements, adhesives, coatings, thinners, additives and catalysts and shall store them in closed containers. The equipment is mostly automated, but, it was noted that applied coatings and any excess materials used to clean and purge equipment were captured and stored in closed containers.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain the application booth portions of EUROLLCOAT with non-atomizing applicators or comparable technology with equivalent transfer efficiency. The equipment used in this EU is non atomizing.

V. TESTING/SAMPLING – None listed

VI. MONITORING/RECORDKEEPING – None listed

VII. REPORTING

1. Deviation reporting pursuant to the ROP has been performed in a timely and correct manner. Please see MACES for further details.

VIII. STACK/VENT RESTRICTION(S) – None listed

IX. OTHER REQUIREMENT(S) – None listed

EURBRMOLDING

DESCRIPTION: Rubber injection and compression presses; and post bon cure oven vented to fabric filter collection.

I. EMISSION LIMIT(S)

1. VOC emissions from this EU are limited to 1.0 pounds per hour and 3.0 tons per year based on a 12 month rolling time period. The highest emissions in pounds per hour in the last 12 months occurred in June of 2015 and were 0.78 pounds per hour. The highest ton per year average was in August of 2015 and was 2.99 tons per year based on a 12 month rolling time period.

2. PM-10 emissions from this EU are limited to 1.0 pounds per hour and 3.0 tons per year based on a 12 month rolling time period. The highest emissions in pounds per hour in the last 12 months occurred in March of 2015 and were 0.74 pounds per hour. The highest ton per year average was in August of 2015 and was 2.99 tons per year based on a 12 month rolling time period.

II. MATERIAL LIMIT(S)

1. The mold release agents used in EURBRMOLDING shall not contain any VOCs as defined by the supplier's MSDS information. A check of the MSDS sheets regarding this material demonstrated they have no VOCs in the mold release agents used.

2. The permittee shall not process more than 12,000,000 pounds of rubber in EURBRMOLDING per year based upon a 12-month rolling time period as determined at the end of each calendar month. Records review indicates the rubber usage was highest in August of 2015 with 11,958,439 pounds processed based on a 12-month rolling time period.

III. PROCESS/OPERATIONAL RESTRICTION(S) – None listed

IV. DESIGN/EQUIPMENT PARAMETER(S) – None listed

V. TESTING/SAMPLING – None listed**VI. MONITORING/RECORDKEEPING**

1. The permittee shall complete all required emissions calculations for VOCs and PM-10 emissions in the units of the applicable standards listed by the 15th day of each calendar month. Records review indicates that calculations are being performed in a timely manner.

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each rubber molding material and mold release agent, including the weight percent of each component. Review of MSDS information indicates this is being performed.

3. The permittee shall keep the amount of rubber processed annually in pounds per 12-month rolling time period as determined at the end of each calendar month. Records review indicates the rubber usage was highest in August of 2015 with 11,958,439 pounds processed based on a 12-month rolling time period.

VII. REPORTING

1. Deviation reporting pursuant to the ROP has been performed in a timely and correct manner. Please see MACES for further details.

VIII. STACK/VENT RESTRICTION(S) – None listed**IX. OTHER REQUIREMENT(S) – None listed****FGAUTODIP**

DESCRIPTION: Two automatic dip systems for applying cement to metal parts. Processes include conveyor system for drying the dipped parts. For FGAUTODIP, the cements are air dried; there are no heat sources for drying. For FGAUTODIP2, the cements are dried by an electric dryer. VOC emissions from both lines are controlled by a regenerative thermal oxidizer.

I. EMISSION LIMIT(S) – None listed**II. MATERIAL LIMIT(S) – None listed****III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall capture all waste cements, adhesives, coatings, thinners, additives and catalysts and shall store them in closed containers. The equipment is mostly automated, but, it was noted that applied coatings and any excess materials used to clean and purge equipment were captured and stored in closed containers.

IV. DESIGN/EQUIPMENT PARAMETER(S) – None listed**V. TESTING/SAMPLING – None listed****VI. MONITORING/RECORDKEEPING – None listed****VII. REPORTING**

1. Deviation reporting pursuant to the ROP has been performed in a timely and correct manner. Please

see MACES for further details.

VIII. STACK/VENT RESTRICTION(S) – Stack parameters for this FG do not appear to have changed recently and appear correct.

IX. OTHER REQUIREMENT(S) – None listed

FGSPRAYMACHINES

DESCRIPTION: Chain-on-edge numbers 1, 2, and 4 are automated booths each for applying cement to metal parts. Prior to entering the booths the parts first pass through a pre-heat oven. The chain-on-edge rotates the parts through spray guns. Chain-on-edge number 3 is also an automated booth for applying cement to metal parts. Parts do not pass through a pre-heat oven. Cement is applied to the parts by spray guns and then the cement is dried in an oven. EUSPRAYMACHINE#9 is a turbo spray system is used for applying cement to metal parts. The system consists of an electrically heated tunnel, a primer application booth, a topcoat application booth and an electrically heated drying tunnel.

I. EMISSION LIMIT(S) – None listed

II. MATERIAL LIMIT(S) – None listed

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste cements, adhesives, coatings, thinners, additives and catalysts and shall store them in closed containers. The equipment is mostly automated, but, it was noted that applied coatings and any excess materials used to clean and purge equipment were captured and stored in closed containers.

2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. The facility places all spent filters in to a closed container which is sent to a type II landfill.

3. The permittee shall not operate the spray booth portions of FGSPRAYMACHINES unless all respective exhaust filters are installed maintained and operated in a satisfactory manner. At the time of the inspection, all filters were in place and appeared in good condition.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain the spray booth portions of FGSPRAYMACHINES with HVLP applicators or comparable technology with equivalent transfer efficiency. HVLP applicators were in place at the time of the inspection. Test caps from them were available for inspection.

V. TESTING/SAMPLING – None listed

VI. MONITORING/RECORDKEEPING – None listed

VII. REPORTING – None listed

VIII. STACK/VENT RESTRICTION(S) – Stack parameters for this FG do not appear to have changed recently and appear correct.

IX. OTHER REQUIREMENT(S) – None listed

FGRTO

DESCRIPTION: Two automatic dip lines, three automated chain-on-edge lines, one turbo spray line, and a roll coater all used to coat metal parts. The VOC emissions from these seven (7) lines are controlled by a single regenerative thermal oxidizer.

I. EMISSION LIMIT(S)

1. VOC emissions from this FG are limited to 56.4 tons per year based on a 12-month rolling time period. Records indicate the highest VOC emissions from this FG in the last 12 months occurred during June of 2014 and were 39.13 tons per year based on a 12 month rolling time period.

2. Ethylbenzene emissions from this FG are limited to 10.0 tons per year based on a 12-month rolling time period. Records indicate the highest ethylbenzene emissions from this FG in the last 12 months occurred during December of 2014 and were 3.88 tons per year based on a 12-month rolling time period

II. MATERIAL LIMIT(S) – None listed

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee is required to have a MAP for this equipment. This MAP was available for inspection by the AQD and continues to be under development.

2. The permittee is required to have negative differential pressure of at least 0.007 inches of water, gauge, on all PTE's when in operation. A review on site of all differential pressure gauges on each booth in FGRT0 indicated a negative pressure greater than 0.007 inches of water, gauge. (See Table 1, attached)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee is required to maintain 1500 F and 95% DE. The last DE testing at this facility occurred on June of 2011 and demonstrated an efficiency of 97%. A review during inspection indicated temperatures above 1500F for each monitor and records on site indicated this temperature is maintained during operation.

2. The permittee is required to maintain negative pressure on PTEs A review on site of all differential pressure gauges on each booth in FGRT0 indicated a negative pressure greater than 0.007 inches of water, gauge. (See Table 1, attached)

3. The permittee is required to have a temperature monitor for the combustion chamber. There are two combustion chambers for this RTO, each equipped with temperature monitor.

4. The permittee is required to have a differential pressure gauge at each PTE. A review on site of each line associated with FGRT0 indicated that each booth is equipped with a differential pressure gauge.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The VOC content, water content and density of any adhesives and coatings, as applied and as received, shall be determined randomly on a yearly basis. Chemical parameters of the various adhesives and coatings are determined through manufacturer's formulation data and Method 24 testing. A sample of this testing is attached to this report.

2. The permittee shall determine destruction efficiency of the RTO. The last DE testing at this facility occurred on June of 2011 and demonstrated an efficiency of 97%.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall complete all required calculations by the 15th day of the calendar month, for the previous calendar month. A review of facility records over the last 12 months indicates this is being

performed in a timely manner

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material used. Data used to determine chemical composition, including testing, MSDS data, and manufacturers formulation data was available for inspection.
3. The permittee shall keep the following information on a monthly basis for FGRT0:
 - a. Gallons (with water) of each cement, adhesive, coating, thinner, solvent, additive and catalyst used. These records are being kept and were available for review. As an example, in August of 2015, the facility used 1770 gallons of the 207 adhesive.
 - b. Where applicable, gallons (with water) of each material reclaimed. This facility does not reclaim materials.
 - c. VOC content (with water) of each material as applied. These records are being kept and were available for review. As an example, the VOC content of the 207 adhesive is 80%.
 - d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month. These records are being kept and were available for review. As an example, the VOC mass emissions for August 2015 were 0.7 tons per calendar month.
 - e. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. These records are being kept and were available for review. As an example, the VOC mass emissions for August 2015 were 17.96 tons per 12-month rolling time period as determined at the end of each calendar month.
4. The permittee shall keep the following information on a monthly basis for FGRT0:
 - a. Gallons (with water) of each ethylbenzene containing material used. These records are being kept and were available for review. As an example, the 6411 adhesive has the highest ethylbenzene content and for August 2015 the facility used 3862 gallons.
 - b. Where applicable, gallons (with water) of each ethylbenzene containing material reclaimed. This facility does not reclaim materials.
 - c. The ethylbenzene content (with water) in pounds per gallon of each material used. These records are being kept and were available for review. As an example, the 6411 adhesive has the highest ethylbenzene content at 15.1%.
 - d. Ethylbenzene mass emission calculations determining the monthly emission rate in tons per calendar month. These records are being kept and were available for review. As an example, the ethylbenzene emissions were 0.06 tons per calendar month
 - e. Ethylbenzene mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. As an example, the VOC mass emissions for August 2015 were 1.86 tons per 12-month rolling time period as determined at the end of each calendar month.
5. The permittee shall monitor and record the temperature in the combustion chamber of the RTO. Upon inspection, both chambers of the RTO were being monitored and recorded.
6. The permittee shall monitor and record the pressure differential between the PTE for FGRT0 and the outside area. Upon inspection, each PTE associated with and controlled by FGRT0 was equipped with a differential pressure gauge that appeared to be functioning.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

1. At the time of the inspection, the stack appeared in compliance and did not appear to have been recently altered.

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for

Hazardous Air Pollutants, as specified in 40 CFR 63, Subpart A and MMMM as they apply to FGRTO.
At the time of the inspection, FGRTO appeared in compliance with this MACT standard.

FGMACT MMMM

DESCRIPTION: Coating lines subject to 40 CFR Part 63, Subpart MMMM, for the surface coating of miscellaneous metal parts and products.

I. EMISSION LIMIT(S)

1. Organic HAP emissions from the general use coatings used at the facility shall not exceed 2.6 pounds per gallon of coating solids used. The facility did not use any HAP containing general use coatings in the last 12 months.
2. Organic HAP emissions from existing rubber to metal coatings shall not exceed 37.7 pounds per gallon of coating solids used. The highest HAP emissions in the last 12 months occurred in July 2014 at 9.08 pounds per gallon of coating solids used.
3. The permittee may comply with a facility-specific emission limit as specified in 40 CFR 63.3890(c)(2). The facility has elected to not use a facility specific emission limit at this time.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The RTO must be operating properly. Proper operation includes a greater than 95% control efficiency and an operating temperature above 1500 F. Testing performed on June of 2011 indicates a control efficiency of 97% and continuous monitoring of the temperature indicates operation above 1500 F.
2. There must be negative pressure on the PTE. PTE's in this group all have pressure drop monitoring and on inspection demonstrated negative pressure.
3. The pressure drop across the enclosure must be at least 0.007 inches of water (H₂O). Pressure drop observations made during the inspection indicated values greater than 0.007 inches of water, gauge. (See Table 1, attached)
4. The monitoring systems for temperature and pressure drop must be operating at all times when the coating equipment is operating. The monitoring for pressure drop on each PTE was in operation. However, the recording for pressure drop was not in operation at the time of the inspection. This system is new and was malfunctioning. The facility anticipated this would be up and running within 24 hours.
5. The permittee shall have spare parts to repair this monitoring. The facility has an extensive maintenance program including spare parts for repairs.

6. The permittee shall implement a work practice plan for this equipment. A work practice plan exists for the facility, was available for review at the time of the inspection, and appears to be being followed.

7. All emission units in FGMACT MMMM shall be in compliance with the work practice standards. A work practice plan exists for the facility, was available for review at the time of the inspection, and appears to be being followed.

8. The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA. No such approval has been applied for at this time.

9. All emission units in FGMACT MMMM shall be in compliance with the operating limits for permanent total enclosures and the RTO. The pressure monitoring and construction of the booths appear to meet the definition and criteria for a PeTE pursuant to Method 204.

10. All emission units in FGMACT MMMM shall be in compliance with the emissions limits at all times except during periods of startup and shutdown. In the last 12 months, records indicate no times when these emissions limits were exceeded.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, and maintain devices to measure air flow direction, static or differential pressure, as appropriate for each emission unit under FGMACT MMMM. All PTE's associated with this group have pressure drop monitoring.

2. Each pressure sensor must be located in or as close to a position that provides a representative measurement of the pressure drop across each opening that is monitored. The placement of these monitoring devices appears correct.

3. The permittee shall install a gas temperature monitor in the firebox of the RTO or in the duct immediately downstream of the firebox before any substantial heat exchange occurs. Devices to monitor temperature are installed and appear to be working properly.

4. The RTO gas temperature sensor must be located in a position that provides a representative temperature. The placement of the monitoring devices appears correct.

V. TESTING/SAMPLING

1. For the RTO temperature sensor, an accuracy audit, including a visual inspection, of the sensor shall be performed quarterly and after every deviation. These inspections have been required since May of 2015 as part of PTI 89-05G. A quarterly inspection should have been performed for second quarter, but was not. This was brought to the attention of facility staff during the inspection and they assured me the inspections would be performed moving forward. Given that the monitoring and recording is constant and the monitors appear to be working, I would recommend that no further action be taken pending the

results of the audits for third quarter.

2. For each gas temperature monitor:
 - a. Conduct an accuracy audit every quarter and after every deviation.
 - b. Perform visual inspections of each sensor every quarter if redundant temperature sensors are not used.

The only required temperature gas monitoring is for the RTO. Please see item V.1 above.

3. For each pressure drop measurement device:
 - a. Conduct accuracy audits every quarter and after every deviation.
 - b. Perform monthly leak checks on pressure connections.
 - c. Perform a visual inspection of the sensor at least monthly if there is no redundant sensor.

These sensors and inspections have been required since May of 2015 as part of PTI 89-05G. A quarterly inspection should have been performed for second quarter, but was not. This was brought to the attention of facility staff during the inspection and they assured me the inspections would be performed moving forward. Given that the monitoring and recording is constant and the monitors appear to be working, I would recommend that no further action be taken pending the results of the audits for third quarter.

VI. MONITORING/RECORDKEEPING

1. A compliance period consists of 12-months. The following compliance determinations must be made:
 - a. The organic HAP emission rate for each compliance period must be equal to or less than the applicable emission limits. Organic HAP emissions from existing rubber to metal coatings shall not exceed 37.7 pounds per gallon of coating solids used.
 - b. Demonstrate continuous compliance with each operating limit that applies when the coating line is in operation.
 - c. Demonstrate continuous compliance with the work practice plan.

Inspection and review of records indicate compliance.

2. The permittee must demonstrate compliance with the applicable emission limits:
 - a. Calculate the total mass of organic HAP emissions.
 - b. Calculate the total volume of coating solids used each month.
 - c. Calculate the mass of organic HAP emission reduction by emission capture systems and add-on control devices.
 - d. Calculate each month's organic HAP emission rate.
 - e. Calculate each 12-month rolling time period organic HAP emission rate.

All of the above tasks (a-e) are being performed at the facility. Records of these tasks are being kept and indicated compliance with HAP emissions limitations.

3. The permittee shall maintain, at a minimum, the following records:
 - a. A copy of each notification and report that is submitted to comply with Subpart M, and the documentation supporting each notification and report. A report assuring compliance with Subpart M is submitted semi-annually. Please see MACES for details
 - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. A current copy of this information was available for

inspection.

c. The calculations specified SC VI.2 for each compliance period. All of the required calculations are being performed at the facility. Records of these tasks are being kept and indicated compliance with HAP emissions limitations.

d. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. Material usage, by each individual material, is being recorded and maintained.

e. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material is tracked by weight. HAP content, by each individual material, is being recorded and maintained.

f. The volume fraction of coating solids for each coating used during each compliance period. Solids content, by each individual material, is being recorded and maintained.

g. The density of each coating, thinner and/or other additive, and cleaning material used during each compliance period. Density, by each individual material, is being recorded and maintained.

h. The date, time, and duration of each deviation. A report assuring compliance with Subpart Mmmm containing this information is submitted semi-annually. Please see MACES for details.

i. For each deviation, whether it occurred during startup, shutdown, or malfunction. A report assuring compliance with Subpart Mmmm containing this information is submitted semi-annually. Please see MACES for details.

j. Records relating to startup, shutdown, or malfunction. A report assuring compliance with Subpart Mmmm containing this information is submitted semi-annually. Please see MACES for details.

k. Records demonstrating continuous compliance with each operating limit in Table 1 of Subpart Mmmm that applies. Records of pressure drop and RTO temperature are being kept.

l. For each capture system that is a PTE, the data and documentation used to support a determination that the capture system meets the criteria in Method 204 of Appendix M to 40 CFR 51 for a PTE and has a capture efficiency of 100 percent. Each enclosure meets the criteria of Method 204.

m. Records of organic HAP capture and destruction efficiency testing.

i. Records of the coating operation conditions during the add-on control device performance test showing that the performance test was conducted under representative operating conditions.

ii. Records of the data and calculations you used to establish the emission capture and add-on control device operating limits as specified in 40 CFR 63.3967 and documentation of compliance with the operating limits as specified in Table 1 of Subpart Mmmm.

For m.i and ii, Capture and destruction efficiency testing was performed in 2011 and demonstrated compliance.

n. Records of the work practice plan including documentation that the plan is being implemented on a continuous basis. A work practice plan exists for the facility, was available for review at the time of the inspection, and appears to be being followed.

o. Records of the leak checks and audits for the RTO temperature sensor, and emission capture system pressure drop measuring device. These inspections have been required since May of 2015 as part of PTI 89-05G. A quarterly inspection should have been performed for second quarter, but was not. This was brought to the attention of facility staff during the inspection and they assured me the inspections would be performed moving forward. Given that the monitoring and recording is constant and the monitors appear to be working, I would recommend that no

further action be taken pending the results of the audits for third quarter.

2. The permittee shall monitor and record the RTO combustion chamber temperature as follows:
 - a. The temperature monitor must complete a minimum of one cycle of operation for each successive 15-minute period. There must be a minimum of four equally spaced successive cycles of monitor operation in 1-hour. Temperature monitoring of the RTO is continuous.
 - b. Determine the average of all recorded temperature readings for each successive 3-hour period of the RTO operation. The average temperature during inspection was greater than 1500 degrees F. The facility reported no deviations from this average temperature.

3. The permittee shall monitor and record the pressure drop across each natural draft opening of each PTE as follows:
 - a. The pressure drop monitor must complete a minimum of one cycle of operation for each successive 15-minute period. There must be a minimum of four equally spaced successive cycles of monitor operation in 1-hour. Pressure drop monitoring is continuous.
 - b. Determine the average of all recorded pressure drop readings for each successive 3-hour period of the PTE operation. The average pressure drop during inspection was less than 0.007 inches of water, gauge. (See Table 1, attached) The facility reported no deviations from this pressure differential.

4. When relocating or replacing the RTO temperature sensor, perform a validation check by comparing the sensor output to a calibrated temperature measurement device or by comparing the sensor output to a simulated temperature. No sensors were relocated.

5. When relocating or replacing a pressure drop measurement device, perform a validation check by comparing the sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources. No sensors were relocated.

6. Any PTE or RTO parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities must not be used when calculating data averages. A review of records indicates calculations are being performed correctly.

VII. REPORTING

1. The permittee shall submit semiannual compliance reports. Required reporting has been submitted in a timely manner. Please see MACES for details.

2. For any startup, shutdown, or malfunction during the semiannual reporting period, the permittee must submit the reports including information regarding them. Required reporting has been submitted in a timely manner. Please see MACES for details.

VIII. STACK/VENT RESTRICTION(S)

Not applicable

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart M for Surface Coating of Miscellaneous Metal Parts and Products by the initial compliance date. The facility appears in compliance with this Subpart.

2. The permittee shall develop and implement a work practice plan. A work practice plan exists for the facility, was available for review at the time of the inspection, and appears to be being followed.

FG-COLD CLEANERS

There is one small parts cleaner in the service shop. It is serviced by an outside contractor. It appeared in good repair. Housekeeping around it was adequate. Information regarding the solvent used in it was available for inspection.

This facility, with some minor exceptions detailed in this report, was in compliance with their air permitting.

NAME 

DATE 10/9/15

SUPERVISOR 