B1608 manila Genesee

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

B160837938

| | | |
|---|---|---|
| FACILITY: General Motors LLC Flint Metal Center | | SRN / ID: B1608 |
| LOCATION: G-2238 Bristol Rd, FLINT | | DISTRICT: Lansing |
| CITY: FLINT | | COUNTY: GENESEE |
| CONTACT: Brent Cousino , Environmental Engineer | | ACTIVITY DATE: 12/14/2016 |
| STAFF: Daniel McGeen | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR |
| SUBJECT: Partial Compliance Evaluation (PCE) activities, done as part of a Full Compliance Evaluation (FCE): scheduled inspection, and review of recordkeeping. | | |
| RESOLVED COMPLAINTS: | | |

**On 12/14/2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted a scheduled inspection of General Motors (GM) LLC Flint Metal Center, and subsequently reviewed facility recordkeeping. These are Partial Compliance Evaluation (PCE) activities, done as part of a Full Compliance Evaluation (FCE).**

**Environmental contacts:**

**Brent Cousino, Environmental Engineer; 810-813-4775; brent.cousino@gm.com**

**Apurva Pujara, Senior Environmental Engineer, RE&F Energy & Environment; General Motors Company; 248-255-7795; apurva.pujara@gm.com**

**Facility description:**

**This facility is a metal stamping plant, which produces hoods, fenders, and body sides out of either steel or aluminum. Some assembly of parts is also done here. Neither priming nor painting of vehicle parts are done at this facility.**

**Emission units in ROP:**

| Emission unit ID | Description | Flexible group ID | Installation date/modification date | Status |
|---|---|---|---|---|
| EUPAINTSHOP | Maintenance paint booth with dry fabric filters | FGRULE287(c) | 01/01/1997 | Compliance |
| EUSEALERS | Sealer application operations and associated solvent wipe cleaning that are exempt from Rule 201 under Rule 290. | FGRULE290; FG-MACT LIGHT DUTY | 01/01/2006 | Compliance |
| EUINKMARKING | Ink marking operation. | FGRULE287(c) | 09/01/2009 | Compliance |
| EUCOLDCLEANERS | Cold cleaners exempt from Rule 201 per Rules 281(h) or 285(r)(iv). | FGCOLDCLEANERS | 01/01/2008 | Compliance |
| EU B-1 BOILER | A 2.2 MMBtu/hr natural gas-fired boiler that serves the Administration Building. | FGBOILER-MACT | 05/01/2005 | Compliance |
| EU B-2 BOILER | A 2.2 MMBtu/hr natural gas-fired boiler that serves the Administrative Building. | FGBOILER-MACT | 05/01/2005 | Compliance |
| EU-GENERATOR#1 | An 80.4 HP natural gas-fired emergency spark ignition (SI) generator located on the roof of the Administration Building. | FGEXT-EMERGENCY | 01/01/2005 | Compliance |
| EU-GENERATOR#2 | A 225 HP natural gas-fired emergency spark ignition (SI) generator located on the roof of the Administration Building. | FGNEW-EMERGENCY | 04/01/2008 | Compliance |
| EU-GENERATOR#3 | A 225 HP natural gas-fired emergency spark ignition (SI) generator located in the basement at L-19. | FGNEW-EMERGENCY | 08/01/2008 | Compliance |
| EU-FIREPUMP | A 420 HP diesel fuel-fired fire pump compression ignition (CI) engine located east of the main plant. | FGEXT-EMERGENCY | 05/01/2000 | Compliance |

**Regulatory overview:**

**This facility has an extremely small amount of yearly emissions. However, it is contiguous and adjacent to the GM Flint Truck & Bus Assembly Plant (SRN B1606), which is a major source of Hazardous Air Pollutants (HAPs). The Flint Metal Center is therefore also considered to be a major source of HAPs, based on the definition from Section 112 of the Clean Air Act. Because the metal center does not support the primary activity of the assembly plant, however, it is treated as a separate stationary source, and so has its own Renewable Operating Permit (ROP).**

**The facility has a current ROP, No. MI-ROP-B1608-2016. The ROP consists of exempt emission units, which are exempt under Rules 287(c), 290, 281(h) and 285(r)(iv). There are also numerous metal stamping machines, exempt under Rule 285(l)(i), and two boilers subject to 40 CFR Part 63, Subpart DDDDD, *National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.***

**EUPAINTSHOP, EUSEALERS, and EUINKMARKING are not considered to be subject to 40 CFR Part 63, Subpart MMMM, the *National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.***

**However, EUSEALERS is subject to 40 CFR Part 63, Subpart III, *National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks.***

**Major sources are required to under go a FCE once every 2 years, under the US Environmental Protection Agency's Compliance Monitoring Strategy.**

**Exempt emission units listed in the ROP application which are not required to be in the ROP:**

| Exempt emission unit ID | Description of exempt emission unit | Rule 212(4) exemption from ROP | Rule 201 exemption |
|---|---|---|---|
| EU-SPACEHEATERS | Natural gas-fired space heaters/air make-up units | Rule 212(4)(b) | Rule 282(b)(i) |
| EU-1K-GASTANK | One 1000-gal above ground gasoline storage tank | Rule 212(4)(c) | Rule 284(g)(i) |
| EU-D1-GRINDING | Non-production grinding at D-1 | Rule 212(4)(d) | Rule 285(l)(vi)(A) |

**The above processes are not subject to any process-specific emission limits or standards in any applicable requirement.**

**Exempt emission units neither required to be in the ROP nor in the ROP application.**

| Exempt emission unit ID | Description of exempt emission unit | Rule 212(4) exemption from ROP | Rule 201 exemption |
|---|---|---|---|
| EU-MACHINING | Various non-production machining | Rule 212(3)(f) | Rule 285(l)(vi) |
| EU-POWERWASH | industrial cleaning pad, located by barrel house | Rule 212(2)(e) | Not subject to Rule 201 |
| EU-WESTSTEAMBOOTH | West die room steam booth | Rule 212(3)(f) | Rule 285 |
| EU-EASTSTEAMBOOTH | East die room steam booth | Rule 212(3)(f) | Rule 285 |
| EU-STORAGE1 | Bulk storage container | Rule 212(4)(c) | Rule 284 |
| EU-STORAGE2 | Bulk storage container | Rule 212(4)(c) | Rule 284 |
| Welders | Welding units/assembly cells | Rule 212(3)(f) | Rule 285(i) |
| Presses | Stamping presses | Rule 212(3)(f) | Rule 285(l)(i) |

**The above processes are not subject to any process-specific emission limits or standards in any applicable requirement.**

Location:

The facility is bordered on the north by GM Flint Truck & Bus Assembly, on the east by GM Flint Engine Operations (SRN B1607), and on the west by US-23. This has been a heavy industrial area for decades. To the south are commercial and/or industrial properties. It is well over 1,000 feet to any residential areas. There are no complaints associated with this facility in AQD files as far back as 1991, and possibly even earlier.

Fee category:

Because the Flint Metal Center is classified as a major source of HAPs, it is considered a Category II source. It pays an annual Category II facility fee, and pays per ton of pollutants discharged. It annually reports estimated air emissions via the Michigan Air Emissions Reporting System (MAERS).

Recent history:

This facility was most recently inspected on 3/24/2015. On 3/17/2016, the ROP was renewed. On 11/21/2016, GM representatives proposed to install an aluminum scrap recycling process at Flint Metal Center. A conveyor would take scrap metal from the process area to an outside shed, where trucks would haul it offsite, for recycling.

Arrival:

On today's inspection, I was accompanied by Mr. Michael Fennell, a Student Intern with the DEQ's Office of Environmental Assistance, for educational purposes. AQD guidance regarding bringing interns on inspections is to make arrangements with the facility in advance, to ensure that adequate facility staff are available to safely escort DEQ staff through the site. Therefore, the time and date for this inspection had been pre-arranged with the GM environmental contacts.

No odors were detected as we drove eastbound on Bristol Road, with the plant to our north. Winds were out of the west at this time. At 9:01 AM, we parked immediately south of the Flint Metal Center. No odors could be detected in the parking lot. There were no visible emissions from exhaust stacks on the roof. A small amount of steam was occasionally seen coming from behind the Administration Building. Weather conditions were partly cloudy and 15 degrees F, with winds out of the west at 10-15 miles per hour.

Upon entering the plant, we were advised by security that the fluorescent yellow safety vests we brought to the site would mistakenly identify us as crane operators, who are required to wear that color here. Orange is the color for site visitors, we were informed. We then viewed a required GM safety video, and met with Mr. Brent Cousino, Environmental Engineer. He explained that they are in a transition phase, as the previous environmental contact for this facility, Ms. Angella Mickowski, is no longer with GM. In this interim period, he is involved with environmental matters both here and at the adjacent GM Flint Engine Operations.

We also met with Mr. Apurva Pujara, Senior Environmental Engineer, from GM's RE&F Energy & Environment, during the pre-inspection meeting. We discussed the purpose of the inspection, and any change at the plant since the 2015 inspection. We were informed that little has changed, but the installation of the proposed aluminum scrap recycling process has been put on hold, for now. Construction at the southeast end of the plant which we had noticed upon arrival was to raise the ceiling/roof of one of the FA bay to be consistent with other bays nearby, we were informed. We were advised that this would not result in any changes in air emissions at the facility, however.

In the future, however, we were advised that some assembly processes which are currently done here may be relocated to the expanded paint shop at the adjacent GM Flint Assembly, SRN B1606. We were advised this might reduce some of the sealer usage and ink marking usage here, but all stamping work will remain here.

We were provided with fabric sleeves to wear, which are a safety requirement, while out on the plant floor. Other required safety gear for visitors to this site includes safety glasses and ear plugs.

Inspection:

EUPAINTSHOP; FGRULE287(c):

Their paint shop has a large booth equipped with mat or panel filters. It is not a production booth, and is operated as needed, like when equipment has been repaired, and needs to be touched up. It was not in use, at this moment. There are exhaust fans which are turned on when the booth is running, and a pressure drop gauge for the booth. Because the fans were not running, the gauge was at 0", water column. The dry paint filters appeared to be almost brand new, and we were informed that they had been replaced on 12/11/2016, three days prior. There is a sliding curtain which closes off the entrance doorway to the booth, when it is in use.

During the pre-inspection meeting, we examined records showing that in January 2016, the maintenance paint booth used 7.5 gallons of coatings, well below the 200 gallons per month allowed by Rule 287(c). Recordkeeping for the paint shop is further discussed under the section of this report on review of recordkeeping.

EUSEALERS; FGRULE290, and FG-MACT LIGHT DUTY:

Between the 2013 and 2015 inspections (please see 3/24/2015 inspection report), there was a reduction in welding cells and an increase in sealer usage. It is my understanding that aluminum is increasingly being used instead of steel for the hoods of some vehicles, to reduce weight and improve fuel economy. It is also my understanding that aluminum cannot be welded the way steel can, for their purposes, so they use adhesive to bond aluminum parts. Gluing is done in cells similar to weld cells.

We were advised that sealers are used in the plant for subassembly of parts, and that occasionally, sealers may be used to join surfaces which are welded later. We observed sealers being applied robotically, in a gluing cell, to the upper and lower surfaces of hood parts, which were then affixed together. No visible emissions could be observed, and no odors could be detected.

EUSEALERS includes only adhesives and sealers that are not part of glass bonding systems, as stated in the ROP. We were advised that the sealers are 98-99% solid materials, and have a very low VOC content. Sealer recordkeeping under Rule 290 is discussed under the recordkeeping section of this report.

The FG-MACT LIGHT DUTY flexible group requirements come from 40 CFR Part 63, Subpart IIII, *National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks.* Sealer recordkeeping under the MACT is also discussed under the recordkeeping section of this report.

EUINKMARKING; FGRULE287(c):

We were advised that ink marking of parts is done for quality checking purposes on a daily basis, with hand held markers, also known as "daubers." We were advised that they keep records of the amount of materials purchased, to track usage. For instance, we were advised that in January 2016, they purchased 0 gallons and 0 lbs of raw materials, as they may have over purchased in December 2015, and In February 2016 they purchased 1.89 gallons of raw materials, equating to 12.52 lbs VOC.

Recordkeeping for EUINKMARKING is further discussed in the review of recordkeeping section of this activity report.

EUCOLDCLEANERS; FGCOLDCLEANERS:

The two cold cleaners in the plant are classified as new units, having been placed into operation on or

after 7/1/1979. The actual installation date is listed in the ROP as 1/1/2008. The other cleaners in the plant utilize water-based cleaning solutions.

We observed one of the two cold cleaners. It uses a solvent for cleaning purposes, and it is unheated. It was not in use, at the moment. The lid to the unit was closed, and there were instructions posted nearby, in this case, above the lid. We were advised that there is a fan which runs when the unit is in use, and vents air emissions through the particulate filter for the paint booth, and through the exhaust stack for the paint booth.

FGCOLDCLEANERS Special Condition (SC) No. II. 1 requires that cleaning solvents shall not be used containing more than 5% of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. It is my understanding that the cold cleaner we saw does not utilize halogenated compounds as the cleaning solvent.

The air/vapor interface on the cold cleaner appeared to be less than ten square feet, which is one of the two design requirement options under SC No. IV. 1. The cold cleaner was equipped with a cover, which was closed when parts were not being handled, as required by SC No. IV. 3. SC No. VI. 3 requires posting of written operating procedures in an accessible, conspicuous location. As previously noted, the instructions for operation were posted above the lid.

EU B-1 BOILER and EU B-2 BOILER; FGBOILER-MACT:

EU B-1 BOILER is a natural gas-fired boiler; Weil-McLain Model 788 Series 1, Model # WCRZ-G-15HTD, rated at 2.2 MMBtu/hr. EU B-2 BOILER is also a natural-gas-fired boiler; Weil-McLain model 788 Series 1 Model # WCRZ-G-15HTD, rated at 2.2 MMBtu/hr.

The boilers are subject to 40 CFR Part 63, Subpart DDDDD, *National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.* It is my understanding that they serve the plant's Administration building, with one operating, while the other serves as backup. One of the boilers was running, at the time of today's inspection. No visible emissions were observed from the plant, other than steam.

On 5/30/2013, AQD received an Initial Notification for Applicability for the two boilers, from the company. An earlier Initial Notification form had been received on 3/15/2012. The more recent document was an update to address the Finalized Major Source Boiler MACT Rule, published on 1/31/2013.

FGBOILER-MACT SC No. III. 1 and Subpart DDDDD require an initial tune up of the boilers no later than 1/31/2016, and a tune-up every five years thereafter. On 3/15/2016, AQD received a Notification of Compliance Status (NOCS) Report for the boilers. This report indicated that the required initial tune-up had been done, and that continuous compliance would be determined by conducting tune-ups according to procedures in Section 63.9(h)(2)(i)(C). SC No. III. 2 requires a one-time energy assessment. The NOCS report stated that the energy assessment was performed. The NOCS Report further indicated that Boilers B-1 and B-2 have neither Boiler MACT emission limitations nor operating parameter limitations.

EU-GENERATOR#1; FG-EXTEMERGENCY; 40 CFR Part 63, Subpart ZZZZ:

This existing engine is one of two in the Flexible Group FGEXT-EMERGENCY. It was not running, at the time of the inspection. I requested documentation on how they show compliance with the requirements of the ROP, which include the requirements of 40 CFR Part 63, Subpart ZZZZ, aka the RICE MACT. I received a copy of required recordkeeping for EU-GENERATOR#1, attached for reference.

This flexible group FGEXT-EMERGENCY contains SC No. III. 5, limiting each engine in the flexible group to no more than 100 hours of operation per calendar year for maintenance checks and readiness testing and emergency demand response. SC No. VI. 3 requires records to demonstrate continuous compliance with operating limitations. The records for January 2016 through November 2016, list the total hours for

maintenance and testing, as well as 12-month rolling hour totals. The month year to date (YTD) with the highest hours of operation was March, with 4.67 hours run. All run hours YTD were for maintenance and testing. The month with the highest 12-month rolling total was November, with 28.5 hours run over that month and the preceding 11 months.

SC No. IV. 1 requires a non-resettable hour meter on each engine in the flexible group. SC No. VI. 5 requires records of hours of operation through the non-resettable hours meter. The monthly hour meter readings were provided for the start and end of each month, for EU-GENERATOR#1.

The ROP requires the unit to be installed, maintained, and operated in a satisfactory manner. Mr. Cousino provided me with a 6/1/2016 example (attached) of the Generator Inspection Checklist for EU-GENERATOR#1, which can be identified by its location, the rooftop. This showed which checklist maintenance items which were acceptable, or needed attention. Comments were provided for tasks items which needed attention.

EU-GENERATOR#2 and EU-GENERATOR#3; FGNEW-EMERGENCY; 40 CFR Part 63, Subpart ZZZZ:

EU-GENERATOR#2 and EU-GENERATOR#3 are classified as new generators, having been installed in April and August of 2008, respectively. They were not running, at the time of the inspection. I received a copy of required recordkeeping for both these generators, attached for reference.

Their requirements are spelled out in the flexible group FGNEW-EMERGENCY in the ROP. SC No. III. 1 prohibits each engine in the group from running more than 100 hours per calendar year for maintenance checks and readiness testing and emergency demand response.

For EU-GENERATOR#2, from January 2016 through November 2016, the total hours for maintenance and testing were listed, as well as 12-month rolling hour totals. The month, YTD, with the highest hours of operation was July, with 5.2 hours run. All run hours YTD were for maintenance and testing. The month with the highest 12-month rolling total was November with 33.1 hours run over that month and the preceding 11 months.

SC No. IV. 1 requires a non-resettable hour meter for each engine. SC No. VI. 1 requires recordkeeping of hours of operation recorded through this non-resettable hour meter. The monthly hour meter readings for EU-GENERATOR#2 were provided for the start and end of each month.

The ROP requires EU-GENERATOR#2 to be installed, maintained, and operated in a satisfactory manner. Mr. Cousino provided me with a 6/1/2016 example (attached) of the Generator Inspection Checklist for EUGENERATOR#2, which can be identified by its location, a platform. This showed which checklist maintenance items which were acceptable, or needed attention. Comments were provided for tasks items which needed attention.

For EU-GENERATOR#3, from January 2016 through November 2016, the total hours for maintenance and testing were listed, as well as 12-month rolling hour totals. The month, YTD, with the highest hours of operation was June, with 0.8 hours run. All run hours YTD were for maintenance and testing. The month with the highest 12-month rolling total was November, with 5.8 hours run over that month and the preceding 11 months. The monthly hour meter readings were also provided for the start and end of each month.

The ROP requires EU-GENERATOR#3 to be installed, maintained, and operated in a satisfactory manner. Mr. Cousino provided me with a 6/1/2016 example (attached) of the Generator Inspection Checklist for EU-GENERATOR#3, which can be identified by its location, in the basement. This showed that all maintenance checklist items were found to be acceptable.

EU-FIREPUMP; FGEXT-EMERGENCY; 40 CFR Part 63, Subpart ZZZZ:

This existing engine is the remaining of the two units in the Flexible Group FGEXT-EMERGENCY. It is a 420 HP diesel fuel-fired pump compression ignition (CI) engine. It was not running, at the time of the inspection. I received a copy of required recordkeeping for EU-FIREPUMP, attached for reference.

**This flexible group FGEXT-EMERGENCY contains SC No. III. 5, limiting each engine in the flexible group to no more than 100 hours of operation per calendar year for maintenance checks and readiness testing and emergency demand response. SC No. VI. 3 requires records to demonstrate continuous compliance with operating limitations. The records for January 2016 through November 2016 list the total hours for maintenance and testing, as well as 12-month rolling hour totals. The month, YTD, with the highest hours of operation was August, with 9 hours run. All run hours YTD were for maintenance and testing. The month with the highest 12-month rolling total was November, with 49.7 hours run over that month and the preceding 11 months.**

**SC No. IV. 1 requires a non-resettable hour meter on each engine in the flexible group. SC No. VI. 5 requires records of hours of operation through the non-resettable hours meter. The monthly hour meter readings for EU-FIREPUMP were also provided for the start and end of each month.**

**Mr. Cousino did not have immediate access to a clear copy of the Generator Inspection Checklist for this unit, he explained, as the copy he had received from a company contanct was not very legible. I indicated that the checklists he had sent me for the other 3 generators at this site appeared to be representative of the group as a whole.**

Stamping presses; Rule 285(I)(i):

**Stamping is done in the east side of the plant and parts are then brought to the center cell area for assembly. They produce parts here for several GM vehicles, we were told, but the parts are going to a number of GM plants, rather than the adjacent Flint Assembly. The manufacturing process starts here when rolls of coiled steel or aluminum enter the plant, and blanks are cut from the rolls. The blanks undergo cold stamping.**

**There are five main types of presses at the plant, for stamping metal:**

1. C presses, accompanied by some assembly.
2. Prog presses, which are slightly larger, and typically have 6 steps which are performed.
3. B presses, are the next largest conventional presses, and typically involve 4 steps.
4. A presses; which are the next largest, and are completely enclosed.
5. AA presses are the largest, and can create an entire vehicle body side.

**We observed one of the smaller stamping presses in operation. There were no visible emissions from the process.**

**We observed an A press, which was not operating at this time, as dies for a Camaro part were being switched out. It is my understanding that this press goes through multiple different steps, each time it is used to form a part.**

**Upon leaving the plant at 11:25 AM, we checked for odors east of the Flint Metal Center and the adjacent GM LLC Flint Engine Operations. No odors could be detected from either of these facilities, however. Weather conditions were partly cloudy, 27 degrees F, and winds were out of the west at 25 to 30 miles per hour.**

**Review of facility recordkeeping:**

**During the inspection, I asked for data for the 3 most recent months, and these records were e-mailed to me, before the end of the day (please see attached). On a subsequent date, these records were reviewed, to check compliance with the ROP and with the exemption rules.**

**EUSEALERS; FGRULE290 data:**

- September 2016: 223.09 lbs VOC emitted, well below the applicable 1,000 lb limit for uncontrolled VOCs under Rule 290.
- October 2016: 246.94 lbs VOC emitted, well below the applicable 1,000 lb limit for uncontrolled VOCs

under Rule 290.
- November 2016: 111.85 lbs VOC emitted, well below the applicable 1,000 lb limit for uncontrolled VOCs under Rule 290.

**The ROP's FG-MACT LIGHT DUTY flexible group requires that organic HAPs in the coatings for EUSEALERS be no more than 0.01 lbs per lb of coating, on a calendar month basis. I requested documentation to verify their compliance with the ROP and MACT requirements, and received the attached MACT - HAP Report - General Sealers document, for the period March through November of 2016. The HAP content of the seven sealers used during this time period was identified as 0.00 lbs/gal, and HAP emissions generated for EUSEALERS were identified as 0.0 lbs for each month in this time period.**

**EUPAINT SHOP; FGR287(c):**

- September 2016: 8.3 gallons per month, far below the 200 gallons minus water per month limit allowed by Rule 287(c).
- October 2016: 2.4 gallons, far below the 200 gallons minus water per month limit allowed by Rule 287(c).
- November 2016: 2.0 gallons, far below the 200 gallons minus water per month limit allowed by Rule 287 (c).

**EUINKMARKING; FGR287(c):**

- September 2016: 1.89 gallons, far below the 200 gallons minus water per month limit allowed by Rule 287 (c).
- October 2016: 0.75 gallons, far below the 200 gallons minus water per month limit allowed by Rule 287 (c).
- November 2016: 1.14 gallons, far below the 200 gallons minus water per month limit allowed by Rule 287 (c).

**MAERS reporting:**

**A MAERS report is submitted yearly for this facility. A 5/17/2016 audit of the facility's MAERS report for the 2015 operating year found the following:**

**For EUPAINTSHOP, the 2015 throughput of coatings was 65 gallons. A spreadsheet attached to the MAERS submittal showed that monthly coating use rates were far below the Rule 287(c) allowed throughput of 200 gallons of coatings per month. Please see hard copy or electronic MAERS records. VOC emissions from EUPAINTSHOP were reported as 125.00 lbs for 2015.**

**For EUSEALERS, the yearly emissions of VOCs were 1,540.00 lbs in 2015. A spreadsheet attached to the MAERS submittal showed that the monthly VOC emission rates were well below the Rule 290 allowed 1,000 lbs per month of uncontrolled emissions. Please see hard copy or electronic MAERS records.**

**For EUINKMARKING, the 2015 throughput of inks was 11 gallons per year. A spreadsheet attached to the MAERS submittal showed that monthly coating use rates were far below the Rule 287(c) allowed throughput of 200 gallons of coatings per month. Please see hard copy or electronic MAERS records. VOC emissions from the inks were reported as 73.00 lbs for 2015.**

**For EUCOLDCLEANERS, the 2015 VOC emissions were reported to be 26.90 lbs. There is no process-specific emission limit in the ROP for the cold cleaners.**

**Conclusion:**

**No instances of noncompliance were identified.**

NAME _____ DATE 1/18/2017 SUPERVISOR _____