

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

B303749912

<b>FACILITY:</b> FITZGERALD FINISHING LLC		<b>SRN / ID:</b> B3037
<b>LOCATION:</b> 17450 FILER, DETROIT		<b>DISTRICT:</b> Detroit
<b>CITY:</b> DETROIT		<b>COUNTY:</b> WAYNE
<b>CONTACT:</b> Amanda Davison , Environmental Health and Safety Coordinator		<b>ACTIVITY DATE:</b> 08/14/2019
<b>STAFF:</b> Jorge Acevedo	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Scheduled Inspection		
<b>RESOLVED COMPLAINTS:</b>		

**COMPANY NAME** : Fitzgerald Finishing  
**FACILITY ADDRESS** : 17450 Filer, Detroit, MI  
**STATE REGISTRAT. NUMBER** : B3037  
**SIC CODE** : 3479  
**LEVEL OF INSPECTION** : PCE  
**DATE OF INSPECTION** : 8/14/19  
**TIME OF INSPECTION** : 2:49 PM  
**DATE OF REPORT** : 8/28/19  
**REASON FOR INSPECTION** : Targeted Inspection.  
**INSPECTED BY** : Jorge Acevedo  
**PERSONNEL PRESENT** : Amanda Davison  
**FACILITY PHONE NUMBER** : 313-368-3630 x 228  
**FACILITY FAX NUMBER** : 313-368-6210

**FACILITY BACKGROUND:**

Fitzgerald Finishing is a coating facility. Fitzgerald focuses on coating small metal parts. Fitzgerald Finishing has been operating since 1957 and is located South of Davison, East of Mound, North of McNichols, and West of Van Dyke, in Detroit.

**INSPECTION NARRATIVE:**

On August 14, 2019, I conducted a targeted inspection of Fitzgerald Finishing. Prior to entering the facility, I drove around the facility at approximately 1:35PM. Skies were partly cloudy and winds were out of the East Southeast. I did not detect any offsite odors while performing odor surveillance. I met with Amanda Davison, Environmental Health and Safety Coordinator and Larry Gutowsky, General Manager, at 1:47PM. I explained that the purpose of my visit was to conduct an inspection to determine Fitzgerald Finishing's compliance with Part 55, Air Pollution Control, of ACT 451(Natural Resources and Environmental Protection Act), the federal Clean Air Act, and Permit 403-99C. Fitzgerald applied and received an updated permit, 403-99C, to increase their VOC emission limit and to install a new thermal oxidizer.

We went into Fitzgerald Finishing's conference room and discussed Fitzgerald Finishing's operations and equipment. Ms. Davison explained some of the changes that occurred at Fitzgerald since the last inspection in 2018. She explained that the oxidizer had been performing fine with no issues. In the previous year, a manufacturer defect caused major damage to the oxidizer. The company was able to use their old oxidizer during the time the main oxidizer was out of commission for repairs. Ms. Davison explained that there were no other big changes that occurred since the last inspection. After our discussion of Fitzgerald Finishing's equipment and operations, we proceeded to conduct the inspection.

We began the inspection at the south end of the facility. I observed the oxidizer and it was operating at the time of the inspection. I did not observe any opacity at the time of the inspection. I observed the operating temperature and it read 1537°F. After observing the oxidizer, we went back inside the facility. I observed Lines 9 and 10. I also observed some shotblast equipment which was not running at the time of the inspection. . Parts are shot blasted if needed to remove paint. There was no excessive shotblast media outside collection barrel. The machine is vented to a dust collector which is not vented externally.

Next, we went to the paint storage area. The area was kept clean and I did not observe any lids open on any of the paint storage containers. I observed Fitzgerald's current inventory of coatings and solvents. I did not detect strong coating or solvent odors while in the paint room. I did not observe excessive spills in the paint storage room.

Next, I observed Line 7 and Line 8 next. They were both operating at the time of inspection. Next, we observed Line 1, Line 2, and Line 3. I stopped and observed one of the lines for awhile as it in the process of coating parts. The coating process usually takes around forty-five minutes. Parts are loaded into the dip spin line, coated, and then the parts are baked in the oven. The oven temperature ranges from 250-520 F° depending on the engineering standard of the part.

Next, I observed the zinc phosphate cleaning line(Jessup line) which had two cleaning tanks. The cleaning lines use a phosphate cleaner for 90% of the parts before they are coated. The phosphate helps the coating adhere better to the part. The washing process takes around 45 minutes to complete. I observed the clarifier and filter press as well.

We went back to the conference room to discuss the inspection. I requested records from 2018 to 2019 year to date. Ms. Davison provided records via email on August 9, 2019. I left the facility at 2:45 PM.

#### **COMPLAINT/COMPLIANCE HISTORY:**

There have not been any citizen complaints registered against Fitzgerald Finishing.

#### **OUTSTANDING CONSENT ORDERS:**

None

#### **OUTSTANDING LOVs**

None

#### **OPERATING SCHEDULE/PRODUCTION RATE:**

Fitzgerald Finishing operates three shifts a day, 5 days a week.

#### **PROCESS DESCRIPTION:**

Fitzgerald Finishing coats small metal parts, such as fasteners. Coating takes place in any of ten "Dip/Spin" lines. Each line consists of a Dip/Spin cabinet and a curing oven. Inside the cabinet at the bottom is a pot of coating. Also inside is a basket, located above the pot. The small metal parts to be coated are conveyed into the cabinet and fall into the basket. The pot, which is half full with coating, is raised until the basket is submerged in the coating. The pot is then lowered so that the basket is out of the coating, but not out of the pot. The basket is then spun to shake off the excess coating. The dip/spin cycle lasts about a minute. The parts are then conveyed into the curing oven. The curing temperature is from about 300 ° F to about 600 ° F depending on the coating. Curing can take up to 45 minutes. The pots and baskets are not cleaned on site. Fitzgerald Finishing has a supply of clean pots and baskets on hand when different coatings are used in the same line.

#### **EQUIPMENT AND PROCESS CONTROLS**

Lines 9 and 10 are located in the southern end of the building. This portion of the building was added on later. Line 4 is located at the northern end, along with the two cleaning lines. The cleaning lines consist of alkaline baths, acid baths and rinse tanks. The cleaning operation is exempt from a permit to install via Rule 290. In the middle portion of the building are Lines 1, 2, 3, 7, and 8.

Emissions from all the lines are routed to a regenerative thermal oxidizer (RTO). Each line also has a bypass stack to vent directly to the ambient air if the RTO shuts down. The RTO is located immediately outside the east side of the building. Its combustion temperature is monitored continuously and recorded on a pie chart inside the building. Each chart records seven days of data.

#### **APPLICABLE RULES/PERMIT CONDITIONS:**

Emissions from the coating lines are regulated by DEQ-AQD permit 403-99C. Because of this permit, Fitzgerald Finishing is a synthetic minor source of HAPs. This permit requires daily records of coating usage and VOC emissions. It also requires monthly records of HAP emissions. The requirements of 403-99C are provided in this report in addition to determination of compliance. Fitzgerald Finishing uses the

services of Derenzo and Associates (contacts Rob Harvey & Andy Rusnak (517) 324-1880) to maintain the records. The records are maintained on an EXCEL spreadsheet format and are also printed every month and stored in binders.

The Compliance Discussion is as Follows:

**The following conditions apply to: FG-DIPSPINS**

**DESCRIPTION:** Eight (8) miscellaneous metal parts coating lines controlled by either RTO1 or RTO2.

Emission Unit ID: EU-DIPSPIN1, EU-DIPSPIN2, EU-DIPSPIN3, EU-DIPSPIN4, EU-DIPSPIN7, EU-DIPSPIN8, EU-DIPSPIN9, EU-DIPSPIN10

**POLLUTION CONTROL EQUIPMENT:** RTO1, RTO2

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Compliance Determination
1. VOCs	54.0 tpy	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance-Records were received from August 2018 to July 2019. VOC emissions were below 54.0 TPY on a 12 month rolling period.
2. Heavy aromatic solvent naphtha (CAS No. 64742-94-5)	157.6 lb/day	Calendar day	FG-DIPSPINS	Compliance-Records were received from August 2018 to July 2019. Heavy Aromatic Solvent Naphtha emissions were below 157.6 lb/day.
3. Cumene (CAS No. 98-82-8)	969.5 lb/yr	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance-Records were received from August 2018 to July 2019. Cumene emissions were below 969.5 lb/yr on a 12 month rolling period.
4. Dibasic ester family (CAS Nos. 627-93-0, 106-65-0,	19,714 lb/yr	12-month rolling time period as determined	FG-DIPSPINS	Compliance-Records were received from August 2018

1119-40-0)		at the end of each calendar month		to July 2019. Dibasic ester emissions were below 19714 lb/yr on a 12 month rolling period.
5. Ethyl methylbenzene (CAS No. 611-14-3)	969.9 lb/yr	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance-Records were received from August 2018 to July 2019. Ethyl methylbenzene emissions were below 969.9 lb/yr on a 12 month rolling period.
6. Ethyl toluene - mixture (CAS No. 25550-14-5)	969.9 lb/yr	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance-Records were received from August 2018 to July 2019. Ethyl Toluene emissions were below 969.9 lb/yr on a 12 month rolling period.

## II. MATERIAL LIMITS

NA

## III. PROCESS/OPERATIONAL RESTRICTIONS

The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1702(a))

**COMPLIANCE-** Containers containing waste materials were closed.

The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. (R 336.1205(3), R 336.1224, R 336.1702(a))

**Compliance-** Coatings were kept in closed containers.

## IV. DESIGN/EQUIPMENT PARAMETERS

The permittee shall not operate FG-DIPSPINS unless an RTO is installed, maintained and operated in a

satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC capture efficiency of 80 percent (by weight), a minimum VOC destruction efficiency of 95 percent (by weight), maintaining a minimum temperature of 1450°F, and a minimum retention time of 0.5 seconds. (R 336.1205, R 336.1702 (a), R 336.1910)

Compliance- Destruction efficiency was tested on February 16, 2011 to determine if the repaired oxidizer was still meeting the destruction efficiency. Test results indicated that destruction efficiency was at 95%.

The permittee shall not exhaust more than six emission units in FG-DIPSPINS to an RTO at any time. The permittee may bypass the RTO for individual emission units when those emission units are applying coatings which contain less than 0.15 pounds of VOC per gallon (minus water), as applied. (R 336.1205, R 336.1702(a), R 336.1910)

Compliance- Fitzgerald Finishing keeps records on bypass emissions on a daily basis.

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1201(3))

The permittee shall determine the VOC content, water content, and density of any coating as applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. (R 336.1205, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))

Compliance- Many of the coatings MSDS do not indicate that whether Method 24 was used.

2. Within 180 days after commencement of trial operation, the permittee shall verify the VOC capture and destruction efficiency for both RTO1 and RTO2, from FG-DIPSPINS by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1205, R 336.1702, R 336.2001, R 336.2003, R 336.2004)

Compliance- Installation of new RTO was occurring at the time of the inspection.

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1201(3))

The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205, R 336.1225, R 336.1702)

Compliance- Calculations are performed every day and monthly and there is a summary produced every month for the current month and past 11 months.

The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor and record the temperature on a continuous basis, during operation of FG-DIPSPINS. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205, R 336.1702(a))

Compliance- Fitzgerald Finishing maintains a monitor which continuously monitors the combustion temperature of the RTO.

The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, and clean-up solvent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the

Department upon request. (R 336.1225, R 336.1702)

Compliance- Fitzgerald Finishing maintains a current list of coatings, reducers, and clean up solvents used at the facility.

4. The permittee shall keep the following information on a monthly basis for the FG-DIPSPINS:
  - a. Gallons (with water) of each coating, reducer, and clean-up solvent used.
  - b. VOC content (minus water and with water) of each material as applied.
  - c. Each emission unit operated in bypass mode including the date and bypass times.
  - d. VOC mass emission calculations determining the monthly emission rate in 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.
  - f. Hourly records of emission units connected to the RTO, and the total number of emission units connected to the RTO.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205, R 336.1702(a))

Compliance- Fitzgerald Finishing maintains records on gallon usage, VOC content of cleanup solvents, VOC content of each coating, and reducer on a daily basis. At the end of the month the emission data is summarized for the current month plus the new rolling 12 month emission totals are calculated. Fitzgerald Finishing keeps records on bypass emissions on a daily basis.

5. The permittee shall keep the following information on a daily basis for the FG-DIPSPINS:
  - a. Gallons (with water) of each heavy aromatic solvent naphtha (CAS No. 64742-94-5) containing material used.
  - b. Where applicable, the gallons (with water) of each heavy aromatic solvent naphtha (CAS No. 64742-94-5) containing material reclaimed.
  - c. The heavy aromatic solvent naphtha (CAS No. 64742-94-5) content (with water) in pounds per gallon of each material used.
  - d. Heavy aromatic solvent naphtha (CAS No. 64742-94-5) mass emission calculations determining the daily emission rate in pounds per calendar day.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>1</sup> (R 336.1225(1))  
Compliance- Records are being kept for specific component containing material.

6. The permittee shall keep the following information on a monthly basis for the FG-DIPSPINS:
    - a. Gallons (with water) of each cumene (CAS No. 98-82-8), dibasic ester, ethyl methylbenzene (CAS No. 611-14-3), and ethyl toluene - mixture (CAS No. 25550-14-5) containing material used.
    - b. Where applicable, the gallons (with water) of each cumene (CAS No. 98-82-8), dibasic ester, ethyl methylbenzene (CAS No. 611-14-3), and ethyl toluene - mixture (CAS No. 25550-14-5) containing material reclaimed.
    - c. The cumene (CAS No. 98-82-8), dibasic ester, ethyl methylbenzene (CAS No. 611-14-3), and ethyl toluene - mixture (CAS No. 25550-14-5) content (with water) in pounds per gallon of each material used.
    - d. Cumene (CAS No. 98-82-8), dibasic ester, ethyl methylbenzene (CAS No. 611-14-3), and ethyl toluene - mixture (CAS No. 25550-14-5) mass emission calculations determining the monthly emission rate in pounds per calendar month.
    - e. Cumene (CAS No. 98-82-8), dibasic ester, ethyl methylbenzene (CAS No. 611-14-3), and ethyl toluene - mixture (CAS No. 25550-14-5) mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.
- The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>1</sup> (R 336.1225(1))

Compliance- Records are kept on a monthly basis. Records were received.

**VII. REPORTING**

**Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of the backup RTO for FG-DIPSPINS. (R 336.1201(7)(a))**

**Compliance- Construction is not complete but facility is aware of notification and testing requirement.**



**VIII. STACK/VENT RESTRICTIONS**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Compliance Determination
SV-RTO1	36	45	Undetermined- The stack height and diameter appeared to be the appropriate height and diameter.
SV-RTO2 (backup)	36	45	
SV-LINE3-BP (bypass)	16	25	
SV-LINE4-BP (bypass)	16	25	
SV-LINE7-BP (bypass)	16	25	
SV-LINE8-BP (bypass)	16	25	
SV-LINE9-BP (bypass)	16	40	
SV-LINE10-BP (bypass)	16	40	

**IX. OTHER REQUIREMENTS**

NA

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply Source-Wide to: FGFACILITY

**DESCRIPTION:** All process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment.

Emission Unit ID: NA

POLLUTION CONTROL EQUIPMENT: RTO1, RTO2

## I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Compliance Determination
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	
3. Formaldehyde (CAS No. 50-00-0)	1,283 lb/yr	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance-Formaldehyde emissions are calculated and are below emission limit.
4. Naphthalene (CAS No. 91-20-3)	7,759 lb/yr	12-month rolling time period as determined at the end of each calendar month	FG-DIPSPINS	Compliance-Naphthalene emissions are calculated and are below emission limit.

## II. MATERIAL LIMITS

NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

NA

**IV. DESIGN/EQUIPMENT PARAMETERS**

NA

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1201(3))

The permittee shall determine the HAP content of any material as applied and as received, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. (R 336.1205(3))

Compliance- Fitzgerald Finishing keeps records of the gallons of each HAP containing material each month. Fitzgerald Finishing does not reclaim any HAP containing material. Fitzgerald Finishing keeps track of the HAP content of each HAP containing material used. Fitzgerald Finishing calculates individual and total HAPs on a monthly basis and on a 12 month rolling basis.

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1201(3))

The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(3), R 336.1225)

Compliance- Calculations are being done and were submitted.

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225)

Compliance- Fitzgerald Finishing maintains MSDS for each coating, reducer, and clean up solvents. HAP coating is determined by manufacturer's formulation data. Fitzgerald Finishing maintains a list of all their coatings, reducers, and clean up solvents with VOC content and HAP content.

3. The permittee shall keep the following information on a monthly basis for FGFACILITY:

- Gallons or pounds of each HAP containing material used.
- Where applicable, gallons or pounds of each HAP containing material reclaimed.
- HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
- Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
- Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3))

Compliance- Records are kept and were submitted on request.

4. The permittee shall keep the following information on a monthly basis for FGFACILITY:

- Gallons or pounds of each formaldehyde (CAS No. 50-00-0) and naphthalene (CAS No. 91-20-3) containing material used.
- Where applicable, gallons or pounds of each formaldehyde (CAS No. 50-00-0) and naphthalene (CAS No. 91-20-3) containing material reclaimed.
- Formaldehyde (CAS No. 50-00-0) and naphthalene (CAS No. 91-20-3) content, in pounds per gallon or pounds per pound, of each material used.
- Formaldehyde (CAS No. 50-00-0) and naphthalene (CAS No. 91-20-3) emission calculations determining the monthly emission rate of each in pounds per calendar month.
- Formaldehyde (CAS No. 50-00-0) and naphthalene (CAS No. 91-20-3) emission calculations determining the annual emission rate of each in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.<sup>1</sup> (R 336.1225(2))

Compliance- Records are kept and were submitted on request.

**VII. REPORTING**

NA

**VIII. STACK/VENT RESTRICTIONS**

NA

**IX. OTHER REQUIREMENTS**

**NA**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

Other equipment not covered in the PTI

The sand blast equipment is exempt under R 336.1285(l)(vi)(B).

The two boilers are exempt under R 336.1282(b)(i). Each has a heat input of less than 10 mmBTU/hr and each was installed before June 1989 and therefore is not subject to the Federal NSPS for boilers. (40 CFR 60 Subpart Dc).

**APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:**  
Fitzgerald Finishing is paved.

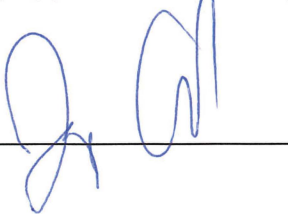
**MAERS REPORT REVIEW**

Fitzgerald Finishing submits MAERS every year and is not fee subject facility. Because of their opt-out permit, they are required to submit MAERS.

**FINAL COMPLIANCE DETERMINATION:**

The facility appears to be in compliance with applicable regulations and PTI 403-99C.

NAME



DATE

9-6-19

SUPERVISOR

W. M