

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

B660847320

FACILITY: THELAMCO INC		SRN / ID: B6608
LOCATION: 1202 TERRITORIAL RD, BENTON HARBOR		DISTRICT: Kalamazoo
CITY: BENTON HARBOR		COUNTY: BERRIEN
CONTACT: Brian McFall, President/CEO		ACTIVITY DATE: 12/04/2018
STAFF: Matthew Deskins	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

On December 4, 2018 AQD Staff (Matt Deskins) went to conduct an unannounced scheduled inspection of the Thelamco, Inc. facility located in Benton Harbor, Berrien County. Thelamco is a Synthetic Minor source with an opt-out permit (PTI No. 597-87A) that was issued to them by the AQD in 2010 when the facility lost its Rule 208a Registration Status. The 208a Registration was an annual submittal that had to be submitted by a certain date that facilities used to certify that their actual emissions were 50% or less of the major source threshold levels. The intent of staff's inspection was to determine their compliance status it and any other state and/or federal air regulation. Staff departed for the facility at approximately 10:45 a.m.

Staff arrived at the facility at approximately 12:35 p.m. after travel time and having lunch. Prior to entering the building, staff took note of the stacks on the thermal oxidizer and didn't observe any visible emissions (VEs) but it might not be in use at the present time if running water-based adhesives. Staff then proceeded into the office area. Staff introduced them self to the receptionist/secretary (Abbey), stated the purpose of the visit, and asked if Brian was available (Brian McFall is President/CEO of Thelamco). Abbey state that Brian had just left for lunch about 10 minutes earlier but is usually back fairly quickly. She then led staff to a conference room where staff would wait for Brian to return. Brian came in to greet staff at approximately 1:00 p.m. Staff introduced them self again to Brian and stated the purpose of the visit. Brian then led staff back to his office where staff asked some general questions about facility operations. The following is a summary of staff's conversations with Brian about facility operations followed by the permit conditions and AQD comments regarding them.

Prior to staff starting to ask any questions, Brian disclosed to staff that they didn't have any current combustion records for the thermal oxidizer. He said that due to several computer upgrades he hasn't been able to access them. Staff then asked Brian how long it has gone on and he said for quite some time. He said that they hadn't looked into getting it fixed because they hardly need to run it. He then went on to say that they have the records of when it was run and that it still operates the way it is required. Brian then went out to get Chris (Plant Manager?) and they started it up to show that it still meets the minimum combustion temperature requirements. Staff mentioned to Brian that he believed the oxidizer functions properly, but it is a very important permit requirement that the temperature be continuously recorded when it's operation. Staff mentioned that it is a violation and staff would have to document it. Brian said that he understood and would look into getting someone out to see if they can access the data. Staff said they would either need to fix the current system or update it because they need to be in compliance with the temperature recording condition.

Staff then went on to ask Brian some other questions about facility operations. The following is a summary of that discussion. According to Brian, Thelamco is still a "job shop" type operation and still revolves around the rotogravure adhesive lamination of various paper and film products using water based and some solvent based adhesives. Brian stated that water-based adhesives are used now about 95% of the time. Brian stated that only a couple of their regular jobs require the use of solvent based adhesives. Staff then asked about solvent usage and Brian stated that the main solvents/reducers still used in the solvent based adhesives are toluene, methyl acetate, and MEK, with MEK being used the most as a reducer and for cleanup. In past inspections Brian had mentioned that the facility also used acetone but quit using it because it evaporated too quickly, especially

during the summertime. Brian then mentioned to staff that they have been looking into the printing of ink-based products and he asked staff if that would require anything additional. Staff mentioned that the AQD does have some permit exemptions that allow companies to expand their business if the activity falls under a certain activity or certain emission threshold criteria (i.e. the 10% Meaningful Change Emission Increase Criteria). However, staff mentioned that if it is something that they for sure want to pursue, it would probably be best to err on the side of caution and talk with staff and the AQD permit section about any changes.

Staff then asked how business has been and Brian went on to state that business has been slow but they've been making ends meet. Staff then asked about the current number of employees and hours of operation. Brian said that in total they employ 8 people and are currently working one 10-hour shift Monday through Thursday from 6:00 a.m. until 4:00 p.m. Staff then asked if they had added or changed any equipment since the last inspection and Brian replied that they haven't. He said that they still just have the two laminators named Thelma and Thundar as well as the paper slitter rewinder. Staff asked what they were currently running. Brian said that only Thundar was currently operating and it was running a water-based adhesive for a paper on paper lamination. He said the finished product is used for things such as business cards. Staff then went with Brian on a tour of the facility.

Our first stop was at the laminator Thelma which was not in operation. Brian showed staff the forms that they had made up after staff's last inspection that now track clean up and purge solvent use. As mentioned in previous inspections, Thelma is the smaller of the two laminators if you go by web width and can process products up to 57 inches wide where as Thundar can do up to 63 inches wide. Both Thelma and Thundar are set up the same but Thelma has an additional drying step to drive off water and is typically the go to machine for paper on paper lamination. Staff then proceeded over to Thundar which had been in use earlier. Both laminators are ducted to the thermal oxidizer. Brian had mentioned during previous inspections that jobs are flagged so employees know when it needs to be operated. Staff had looked at the control panel of the thermal oxidizer earlier when Chris had started it up and noted it had an hour meter and high and low temperature alarms. It is equipped with a Honeywell Controller that continuously monitors temperature, but as was mentioned earlier, Brian stated that he couldn't access the data logger to download the recorded combustion temperatures. When operational, the thermal oxidizer operates between 1400 and 1480 degrees Fahrenheit. The high temperature shutdown is at 1480 and the low temperature is 1400. Staff also had observed the paper slitter. It was not in operation and all the machine is used for is to cut the paperboard rolls into smaller sizes if needed. Staff had previously asked Brian if any of the water-based adhesives are delivered by tanker still. He said that they still haven't had any tanker deliveries since they lost their big customer a number of years ago. He said now the water-based adhesives and MEK come in totes and Toluene comes in 55 gallons drum. Staff then proceeded with Brian back to his office to review records. Brian had all the information but didn't have it all entered into the computer database. Staff asked Brian to update the records and e-mail them to staff by the following week and he said that he would. Staff received the records from Brian on December 17th. He said he had sent them the previous week but for some reason they didn't come through. The following lists the Special Conditions of PTI No. 597-87A and what staff noted.

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
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Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EULAMINATOR01	Direct Gravure application of adhesive to web of plastic film or paper for combining as a lamination to paper, film or paper board. (Thelma)	1978	FGLAMINATORS
EULAMINATOR02	Direct Gravure application of adhesive to web of plastic film or paper for combining as a lamination to paper, film or paper board. (Thundar)	1987	FGLAMINATORS
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGLAMINATORS	Direct Gravure application of adhesive to web of plastic film or paper for combining as a lamination to paper, film or paper board. The emissions from the laminators are controlled by a thermal oxidizer, except for waterborne coatings with a VOC content of 0.30 lb/gallon, minus water as applied or less.	EULAMINATOR01 EULAMINATOR02
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

The following conditions apply to: FGLAMINATORS

DESCRIPTION: Direct Gravure application of adhesive to web of plastic film or paper for combining as a lamination to paper, film or paper board.

Emission Units: EULAMINATOR01 and EULAMINATOR02

POLLUTION CONTROL EQUIPMENT: Thermal oxidizer, except that bypass is allowed for waterborne coatings with a VOC content of 0.30 lb/gal minus water as applied, or less.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	60 tpy	12-month rolling time period as determined at the end of each calendar month	FGLAMINATORS	SC VI.1 SC VI.4	R 336.1205, R 336.1702(a)
2. VOCs	1,000 lb/day	Calendar Day	FGLAMINATORS	SC VI.1 SC VI.5	R 336.1205, R 336.1702(a)
3. VOCs	55.0 pph	Test Protocol	FGLAMINATORS solvent based coatings (adhesives)	SC V.2	R 336.1702(a)
4. Acetaldehyde (CAS # 75070)	8.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGLAMINATORS	SC VI.1 SC VI.4	R 336.1225
5. Acetaldehyde (CAS # 75070)	66.24 lb/day	Calendar Day	FGLAMINATORS	SC VI.1 SC VI.5	R 336.1225
6. Acrylic Acid (CAS # 79107)	7.68 lb/day	Calendar Day	FGLAMINATORS	SC VI.1 SC VI.5	R 336.1225
7. Tetramethyl-5-decyne-4,7-diol,2,3,7,9 (CAS # 126863)	1419.12 lb/year	12-month rolling time period as determined at the end of each calendar month	FGLAMINATORS	SC VI.1 SC VI.4	R 336.1225

AQD Comment: Appears to be in COMPLIANCE with #1 and #2 above. Staff reviewed 12-month rolling records ending November 2018 and the facility is well under these amounts. As mentioned earlier, approximately 95% of the adhesives/products they use are water based. #3 through #7 above appear to be N/A at the present time because the AQD has not requested testing to show compliance with #3, and staff was told the facility hasn't used any adhesives that contain any of the compounds listed in #4, #5, and #7. Staff was told that the facility included the MSDS for adhesives that contained these compounds while getting the opt-out permit just in case they were to be used in the future. #6 above was used in an adhesive from the large company which whom they don't do business with anymore and they haven't used the product in a number of years.

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	0.30 lb/gal, minus water as applied*	Instantaneous	Waterborne Coatings for FG-LAMINATORS Thermal Oxidizer Bypass	SC VI.1 SC VI.4	R 336.1225 R 336.1702(a)

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
*The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. (R 336.1602(4))					

AQD Comment: Will assume to be in COMPLIANCE at the present time. Staff did not take any samples for laboratory analysis during this inspection.

2. Applicant shall not substitute any adhesives and solvents (reducers) for those described in this permit application which would result in an appreciable change in the quality or any appreciable increase in the quantity of the emission of an air contaminant without prior notification to and approval by the Air Quality Division. (R 336.1225, R 336.1702)

AQD Comment: Appears to be in COMPLIANCE. The facility appears to use a few main adhesives and others that they use occasionally would not appear to increase the amount of the emissions.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall handle all VOC and 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 336.1225, R 336.1702(a), R 336.1901)

AQD Comment: Appears to be in COMPLIANCE. They store their wastes in 55 gallon drums and Ashland Company still handles/processes their waste materials.

2. The permittee shall only operate one laminator in FGLAMINATORS during the use of solvent based coatings. (R 336.1225, R 336.1702)

AQD Comment: Appears to be in COMPLIANCE. Staff was told that they comply with this condition. During the inspection only one laminator (Thundar) was in use and they were running a water based adhesive so it was not applicable at that time anyway.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate FGLAMINATORS unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner, unless waterborne coatings with VOC content of not greater than 0.30 lb/gallon, minus water, are used as allowed in SC II.1. Satisfactory operation of the thermal oxidizer includes a minimum VOC capture efficiency of 90 percent (by weight), a minimum VOC destruction efficiency of 97 percent (by weight), and maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. (R 336.1205, R 336.1225, R 336.1702, R 336.1901, R 336.1910)

AQD Comment: Appears to be in COMPLIANCE.

2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the thermal oxidizer to monitor and record the temperature on a continuous basis, during operation of FGLAMINATORS. (R 336.1205, R 336.1225, R 336.1702, R 336.1901)

AQD Comment: Appears to be in COMPLIANCE. The unit is equipped with a Honeywell Controller that has a data logger to continuously monitor and record the combustion temperature.

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content, and density of any coating (adhesive) and reducer 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 336.1225, R 336.1702, R 336.1901, R 336.2001, R 336.2003, R 336.2004)

AQD Comment: Appears to be in NON-COMPLIANCE. Staff had made the facility aware of this condition during the previous inspection in 2015 and that they needed to submit a request to the AQD District Supervisor if they wanted to use Manufacturers Data for determining VOC content. A request was never submitted and the facility has never had any products testing using Method 24.

2. Upon request from the AQD District Supervisor, the permittee may be required to verify the VOC emission rate while using non-waterborne coatings by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. 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 within 60 days following the last date of the test. (R 336.1225, R 336.1702, R 336.2001, R 336.2003, R 336.2004)

AQD Comment: COMPLIANCE. The AQD had not request any stack testing to date.

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th 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, R 336.1901)

AQD Comment: Appears to be in COMPLIANCE. The facility is maintaining records in a 12-month rolling format and some by calendar day where applicable.

2. The permittee shall monitor, in a satisfactory manner, the temperature in the thermal oxidizer on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. (R 336.1205, R 336.1225, R 336.1702, R 336.1901)

AQD Comment: Appears to be in COMPLIANCE. The oxidizer is equipped with a Honeywell Controller that monitors the combustion temperature continuously when it is in use.

3. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating (adhesive) and reducer, 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, R 336.1901)

AQD Comment: Appears to be in COMPLIANCE. Facility maintains MSDS.

4. The permittee shall keep the following information on a monthly basis for each coating line in FGLAMINATORS:
 - a) Gallons (with water) or pounds of each coating (adhesive) and reducer used.

- b) VOC content (minus water and with water) of each coating (adhesive) and reducer as applied.
 - c) Density of each coating (adhesive) and reducer.
 - d) VOC and acetaldehyde mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e) VOC and acetaldehyde 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) Tetramethyl-5-decyne-4,7-diol, 2,3,7,9 mass emission calculations determining the monthly emission rate in pounds per month and annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.
 - g) Hours of operation when using thermal oxidizer.
 - h) Emission unit, date and duration of thermal oxidizer bypass while using waterborne coatings.
- 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 336.1225, R 336.1702, R 336.1901)

AQD Comment: Appears to be in COMPLIANCE with the items above. The facility maintains a spreadsheet that tracks this information. It includes the adhesives and diluents that they are using in each laminator, hours of operation of each laminator, hours of thermal oxidizer operation, etc. VOC emission calculations are being done monthly and staff was told that they haven't used any adhesive that contains acetaldehyde nor the Tetramethyl-5-decyne-4,7-diol, 2,3,7,9.

5. The permittee shall keep the following information on a daily basis for each coating line in FGLAMINATORS:
- a) VOC mass emission calculations determining the daily emission rate in pounds per calendar day.
 - b) Acetaldehyde and acrylic acid 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. (R 336.1205, R 336.1225, R 336.1702, R 336.1901)

AQD Comment: Appears to be in COMPLIANCE with the above. The facility is tracking VOC emissions on a daily basis as required in A above and staff was told that they haven't used any adhesives that contain acetaldehyde and acrylic acid as mentioned in B above.

6. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with the FGLAMINATORS:
- a) Gallons of each solvent used and reclaimed.
 - b) VOC content, in pounds per gallon, of each solvent used.
 - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) 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.
- 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 336.1225, R 336.1702, R 336.1901)

AQD Comment: Appears to be in COMPLIANCE with the above.

7. The permittee shall keep, in a satisfactory manner, continuous records of the temperature in the thermal oxidizer. The permittee shall keep all records on file and make them available to the

Department upon request. (R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.1702, R 336.1901)

AQD Comment: Appears to be in NON-COMPLIANCE. The oxidizer is equipped with a Honeywell Controller that records this information when the thermal oxidizer is in use; however, they haven't been able to access the data in quite some time due to computer upgrades.

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)	Underlying Applicable Requirements
1. SV-THERMOX	39	40	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
2. SV-BYPASS01	30	41	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
3. SV-BYPASS02	30	41	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

AQD Comment: Appears to be in COMPLIANCE. The stacks appear to meet the dimensions listed above.

IX. OTHER REQUIREMENTS

1. Within 30 calendar days after the issuance of this permit, the permittee shall label each emission unit with a method acceptable to the District Supervisor. The permittee must notify the District Supervisor, Air Quality Division, in writing as to the date that the labeling was completed. This notification shall take place within 15 calendar days after the labeling has been completed. (R 336.1201)

AQD Comment: Appears to be in COMPLIANCE. The laminators are labeled Thelma and Thundar and have always been labeled.

2. The minimum stack height above ground level listed in SC VIII.2 and SC VIII.3 shall apply within 30 days of issuance of this permit. (R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))

AQD Comment: Appears to be in COMPLIANCE. The stack heights appear to be permit requirements.

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT: Thermal oxidizer, except that bypass is allowed for waterborne coatings with a VOC content of 0.30 lb/gal minus water as applied, or less.

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing/ Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
3. VOCs	70 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)

AQD Comment: Appears to be in COMPLIANCE with the above. Toluene is the highest individual HAP and both it and aggregate HAPs emissions were well below the above limits according to records reviewed. Total VOC emissions are around a ton since the majority of the products they use are water based.

V. TESTING/SAMPLING

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

1. The permittee shall determine the HAP content of any coating (adhesive) and reducer 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))

AQD Comment: Appears to be in COMPLIANCE.

2. The permittee shall determine the VOC content, water content, and density of any coating (adhesive) and reducer 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(3))

AQD Comment: Appears to be in NON-COMPLIANCE. Staff had made the facility aware of this condition during the previous inspection in 2015 and that they needed to submit a request to the AQD District Supervisor if they wanted to use Manufacturers Data for determining VOC content. A request was never submitted and the facility has never had any products testing using Method 24.

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(3))

AQD Comment: Appears to be in COMPLIANCE. The facility is maintaining records in a 12-month rolling format and some by calendar day where applicable.

2. The permittee shall keep the following information on a monthly basis for FGFACILITY:
- a) Gallons or pounds of each HAP containing material used.
 - b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
 - c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
 - d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
 - e) 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. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months.

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))

AQD Comment: Appears to be in COMPLIANCE with the above.

3. The permittee shall keep the following information on a monthly basis for FGFACILITY:
- a) Gallons or pounds of each VOC containing material used.
 - b) Where applicable, gallons or pounds of each VOC containing material reclaimed.
 - c) VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
 - d) VOC emission calculations determining the monthly emission rate in tons per calendar month.
 - e) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months.

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

AQD Comment: Appears to be in COMPLIANCE with the above.

INSPECTION SUMMARY: The facility appears to be in NON-COMPLIANCE with certain conditions of PTI No. 597-87A and staff will have to send a violation notice regarding them. Staff departed the facility at approximately 2:40 p.m.

NAME Matt Dark

DATE 12-18-18

SUPERVISOR MA 12/18/2018