

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

N207931233

FACILITY: Lacks Industries, Inc.		SRN / ID: N2079
LOCATION: 4375 52ND STREET SE, KENTWOOD		DISTRICT: Grand Rapids
CITY: KENTWOOD		COUNTY: KENT
CONTACT: Karen Baweja, Supervisor of Air Quality		ACTIVITY DATE: 09/15/2015
STAFF: David Morgan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

On June 2, 2015 Air Quality Division staff Dave Morgan and Kaitlyn DeVries conducted a scheduled inspection of the Lacks Enterprises', Barden Assembly and Barden Plater in Kentwood. The primary contact on the inspection was Karen Baweja, Supervisor of Air Quality. The purpose of the June 2nd inspection was to verify the compliance status of Renewable Operating Permit (ROP) No. MI-ROP-N2079-2012, Section 2 and other state and federal air pollution regulations.

On September 15, 2015 Air Quality Division staff Dave Morgan conducted a scheduled inspection of the Lacks Enterprises' 52nd Paint East, 52nd Paint West, and 52nd Mold facilities located in Kentwood. The primary contact on the inspection was Karen Baweja; Supervisor of Air Quality. The purpose of the September 15th inspection was to verify the compliance status of ROP No. MI-ROP-N2079-2012, Section 1 and other state and federal air pollution regulations.

FACILITY INFORMATION

The Lacks Enterprises stationary source consists of 52nd Paint East, 52nd Paint West, 52nd Mold, Barden Assembly, and Barden Plater. This stationary source is a major source of VOC and hazardous air pollutants (HAPs) and permitted under ROP No. MI-ROP-N2079-2012. Although the source is a major stationary source, it is a synthetic minor source with respect to Prevention Significant Deterioration (PSD) requirements. The entire stationary source is subject to the Plastic Parts Surface Coating NESHAP (40 CFR Part 63, Subpart PPPP) and the Barden Plater is subject to the Chromium Electroplating NESHAP (40 CFR Part 63, Subpart N). The Paint East and Paint West coating lines are also subject to Compliance Assurance Monitoring (CAM) requirements (40 CFR Part 64).

COMPLIANCE EVALUATION

BARDEN PLATER (ROP Section 2)

The Barden Plater consists of a fully automated decorative chrome plating line used to plate plastic automotive parts. The process consists of various acid, conditioning and rinse tanks. The following table identifies a summary of emission units and flexible groups from ROP No. MI-ROP-N2079-2012 with applicable requirements.

<u>Unit</u>	<u>Description</u>	<u>Stack ID</u>	<u>Pollutants</u>	<u>Control</u>
EUCONDITIONER	EUCONDITIONER is for one tank used to prepare plastic parts to accept plating metal and is also controlled by CMP SV-1.	SVK-1	1,3 dichloro-2-propanol (DCP)	Packed bed scrubber w/ mist eliminator (PBS)
FGCHROME1	Three chromic acid etch tanks, a chrome conversion unit, and a chrome recovery unit.	SVK-2	Chromium	Composite Mesh Pad (CMP)
FGNEUTCATACC	Neutralizer, catalyst, and accelerator process tanks.	SVK-3	NA	No control
EUELECTROLESSCU	Electroless copper plating tank.	SVK-4	Formaldehyde, methanol	PBS

FGCOPPER	Copper electroplating tanks.	SVK-5	NA	No control
FGSEMINICKEL	Five semi-brite nickel electroplating tanks.	SVK-6	Nickel	No control
FGBRIMICRONI	Brite and micro-porous electroplating tanks.	SVK-7	Nickel	No control
FGCHROME2	Three decorative chrome plating tanks and a chrome recovery unit.	SVK-8	Chromium	CMP
FGSTRIPTANKS	Chromic acid and nitric acid strip tanks.	SVK-9	NA	PBS

It is noted that the company is also permitted to use electroless nickel (EUELECTROLESSNI) but does not do so at this time.

**Testing:**

At the time of the inspection, a stack test was being conducted in accordance with ROP No. MI-ROP-N2079-2012. The testing was conducted by Network Environmental. At the time of the test, the plating line was operating under maximum routine production, around 35 bars per hour (maximum is 36 bars per hour). The following is a summary of the most recent stack test results for the Barden Plater:

Equipment	Pollutant	Limit lb/hr	Test Result lb/hr	Test Date	Compliance	Next Test Due
FGCHROME1-SVK2	total chromium	0.0025	1.50E-04	6/2/15	Yes	6/2/17
FGCHROME2-SVK8	total chromium	0.0006	1.90E-04	6/2/15	Yes	6/2/17
EUELECTROLESSCU-SVK4	methanol	12.2	6.81	6/6/13	Yes	6/6/17
EUELECTROLESSCU -SVK4	formaldehyde	2.97	0.051	6/6/13	Yes	6/6/17
EUCONDITIONER-SVK1 (retest)	1,3 dichloro-2-propanol	0.48	0.453	8/16/13	Yes	8/16/17
FGSEMINICKEL -SVK6	nickel	0.028	0.00592	6/4/13	Yes	6/4/17
FGBRIMICRONI - SVK7	nickel	0.017	0.00175	6/5/13	Yes	6/4/17

**O&M Plan:**

The company operates all emission units at the Barden Plater in accordance with the O&M Plan dated October 21, 2013.

**FGCHROME1 and FGCHROME2:**

The company uses a control device to meet the 0.005 mg/dscm chromium limit for FGCHROME2 which is based on 40 CFR 63, Subpart N and the 0.012 mg/dscm chromium limit for FGCHROME1 which is based on Rule 225.

**CMPs:**

Each CMP unit consists of three composite mesh pads. The first pad is washed down hourly, the second pad is washed down daily, and the third pad is washed down weekly. All wash downs consist of fresh water. The weekly wash of the final pad is performed during blower shut down on weekends.

For chrome plating CMPs a pressure drop range is required by the NESHAP to be established through stack testing. For the etch CMPs, the pressure drop range is established through stack testing only as a condition of the company's Operation and Maintenance (O&M) Plan. The pressure drop is recorded on a daily basis in accordance with the Chrome NESHAP and O&M Plan. Daily pressure drop records were reviewed for June 2014 through May 2015 and all pressure drops were within ranges established during the most recent stack test.

AQD staff conducted observations of the pressure drop on the CMPs. At the time of inspection, the pressure drop across the entire chrome plating CMP was 3.3" of H2O. The acceptable range at the time was 1.6" to 5.6" of H2O. Pressure drop range established during the July 2015 stack test is 1.32" to 5.32" of H2O. The pressure drop across the entire etch CMP was 3.6" of H2O. The acceptable range at the time was 1.7" to 5.7" of H2O. Pressure drop range established during the July 2015 stack test is 1.55" to 5.55" of H2O.

The plating line also has a chromic acid reclaim system. This unit is inside the building prior to the roof mounted CMP. Air drawn from the three chrome tanks enters the two stage reclaimer which is comprised of plastic balls which provide surface area for the chrome to collect on. The chromic acid etch rinse tank water is taken from the tanks and is heated to evaporate a portion of the water. The chrome laden water is then piped back to the chromic acid etch plating tanks.

The company continuously monitors all control device and system operations (including differential pressures, washdown and scrubber water flow and blower amperage) through an automated computer system and also maintains a computer system for scheduling maintenance. Alarm set points are monitored and alarms sound should readings fall outside or below set parameters.

It is noted that the computer system records alarms and exceptions to normal operating conditions including the date and time. If a malfunction occurs, the process is shutdown and a work order requested.

Inspection of the mesh pads for proper drainage, chemical breakthrough, and leaks is conducted on a quarterly basis (and sometimes as often as monthly) in accordance with the ROP, NESHAP, and O&M Plan. The facility keeps daily, monthly, and quarterly maintenance records. The company has gone from daily to weekly roof top observation checks for visible emissions. Staff reviewed records for June 2014 through May 2015 which are attached. The company had documentation showing the quarterly inspections were conducted and had documentation of work orders to correct identified problems. Maintenance records have improved since the last AQD inspection.

#### Surface Tension:

Although the company is not using surface tension to comply with the NESHAP, FGCHROME2 is required to meet a surface tension less than 45 dynes/cm in order to insure compliance with Rule 225. The facility maintains a surface tension less than 45 dynes/cm by measuring and making surfactant adds as needed every 4 hours of tank operation. Staff reviewed surface tension records (attached) and from October 2014 through May 2015, there were no measurements above 42 dynes/cm during plating operation. The company typically adds additional surfactant and remonitor after four hours. During the inspection, the chrome plating and etch tanks were operating below 35 dynes/cm.

#### Reports:

The company is maintaining the semi-annual Ongoing Compliance Status Report in accordance with the NESHAP. The facility submits all required reports by the specified timeframes.

#### ***EUELECTROLESSCU, EUCONDITIONER, FGSTRIPTANKS and Packed bed scrubbers:***

For all packed bed scrubbers, the company monitors pressure drop, minimum water flow rate and water bleed-off rate on a continuous basis. Alarms are in place should the level fall outside of established parameters. In addition a pressure drop is recorded by lab personnel on a daily basis. The packed beds were operating at the time of the inspection and no apparent problems, leaks or gaps were noted.

It is noted that weekly checks are conducted on PBS nozzles as part of the company's maintenance program. Maintenance records from June 2014 through May 2015 are attached.

EUCONDITIONER had a packed bed scrubber that appeared to be installed and operating properly. At the time of the inspection the pressure drop was 2.6" H<sub>2</sub>O, water flow through the scrubber was 56 gpm, and bleed-off flow was 4.6 gpm. It is noted that the company began monitoring scrubber water flows on all scrubbers after problems were identified with the EUCONDITIONER bleed-off in 2013.

EUELECTROLESSCU had a packed bed scrubber that appeared to be installed and operating properly. At the time of the inspection the pressure drop was 4.2" H<sub>2</sub>O, water flow was 170 gpm.

The company is currently recording the hours of operation from the electroless copper tank in accordance with the ROP. According to the permit, the company can calculate the hours limitation based on actual formaldehyde and methanol emissions. The company's calculated limit is 10,493 hours/year which the company will never exceed. From June 2014 through May 2015, EUELECTROLESSCU operated 5,750 hours. In addition, combined methanol and formaldehyde emissions (total VOC) were 19.7 tons which is below the 36 ton per 12-month rolling time period limit in the permit.

Under FGSTRIPTANKS rack cleaning operations consist of a sodium hydroxide tank and a nitric acid tank. The nitric acid tanks are used to chemically remove copper and nickel from plating racks and the caustic tank uses reverse current to remove chrome from plating racks. On the line both the acid and caustic tanks are exhausted to one PBS. Pressure drop across the packed bed scrubber and scrubber water flow are monitored and recorded. At the time of the inspection the

pressure drop was 1.0" H<sub>2</sub>O and flow was 87 gpm. This process appeared to be installed and operating properly.

**NEUTRALIZER, CATALYST, ACCELERATOR, COPPER PLATING, and NICKEL Plating:**

**EUEMERGENCYRICE-CI:**

The Barden Plater has a diesel-fired emergency generator rated at 275 kW, less than 500 hp. The unit is maintained and operated in accordance with manufacturer's recommendations. Maintenance is conducted annually by the manufacturer (Cummins Bridgeway LLC) and last occurred on February 2, 2015. Maintenance includes changing oil, spark plugs, air filters and more. See attached maintenance record. The equipment has operated 554.2 hours since installation. There is a non-resettable hours meter to verify operating hours. The company is maintaining records in accordance with 40 CFR Part 63, Subpart ZZZZ.

**BARDEN ASSEMBLY (ROP Section 2)**

The Barden Assembly facility consists of molding machines, various assembly processes, and several coating booths all exempt from air use permitting. At the Barden Assembly facility, plastic plated wheel covers are adhered to steel or aluminum wheel rims. Adhesive is applied using robots in various machines. In addition there are additional machines in which rigid foam is injected between the wheel cover and rim for adhesion. The foam is a two part isocyanate and catalyst mixture which contains polymeric diphenylmethane diisocyanate, 4,4 diphenylmethane, and diphenylmethane diisocyanate. The resin mixture is heated to 120°F. Once the foam reaction occurs, additional curing takes place in an oven set at 180°F. The rigid foam appears to be a closed cell, rigid foam and not subject to the requirements of the NESHAP for Flexible Foam under 40 CFR Part 63, Subpart III. There are also two prime booths used to apply a silicone rubber bead on cladding.

**FGRULE290:**

All equipment at Barden Assembly is exempt from permitting under Rule 290. Records kept by the company from June 2014 through May 2015 show VOC emissions at or below 875.6 lbs/month for all Rule 290 emission units at the facility. This is below the 1,000 lb/month limit for each emission unit.

**FGCOLDCLEANERS:**

All cold cleaners had lids closed and proper operating procedures posted. Company was in compliance with all requirements pertaining to cold cleaners.

**EUEMERGENCYRICE-SI:**

Barden Assembly has a natural gas-fired emergency generator rated at 20 kW, less than 500 hp. The unit is maintained and operated in accordance with manufacturer's recommendations. Maintenance is conducted annually by the manufacturer (Cummins Bridgeway LLC) and last occurred on February 2, 2015. Maintenance includes changing oil, spark plugs, air filters and more. See attached maintenance record. The equipment has only operated 134.5 hours since installation. There is a non-resettable hours meter to verify operating hours. The company is maintaining records in accordance with 40 CFR Part 63, Subpart ZZZZ.

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**PAINT EAST (ROP Section 1)**

The Paint East facility, located at 4375 52nd Street in Kentwood, primarily consists of one main coating line that applies a prime, base and clear coat to exterior plastic automotive parts. The company processes large grills for trucks as well as other trim parts. All of the robotic booths at Paint East are recirculating booths with emissions captured and destroyed in one regenerative thermal oxidizer (RTO). There is also one sample booth. The Paint East facility also contains a solvent distillation unit used for solvent recovery.

**O&M Plan:**

The company operates all emission units at East Paint in accordance with the O&M Plan dated July 15, 2014.

**FGEASTPAINT:**

This emission unit consists of air-dried prime/adhesion prime, base, and clear coat applications to plastic parts. This emission unit includes both manual and robotic paint booths. Prime coating consists of one auto booth, which has two robotic HVLP sprayers, and one manual booth. Upon inspection the manual spray booth had a conventional spray gun. According to the AQD Permit Evaluation for the original Permit to Install No. 201-05, "Electrostatic and/or HVLP guns create problems when used to coat fresh [prime] parts... Thus the use of conventional air atomized spray guns represents

BACT for the prime booths." After the prime booth, parts are air dried in a flash off area.

The base and clear coat applications each have one auto booth consisting of four robotic electrostatic spray guns and one manual booth. Upon inspection, the base manual booth had an electrostatic spray gun and the clear manual booth had a conventional spray gun. The company provided information on the spray gun model and air cap to confirm the type of applicators used (records attached). Under ROP MI-ROP-N2079-2012, Condition, FGEASTPAINT, IV.3, the company is required to equip and maintain all basecoat and clearcoat spray booths with electrostatic or equivalent technology. This was further confirmed by the AQD Permit Evaluation from the original Permit to Install No. 201-05 for these booths. The evaluation noted, "Lacks has proposed the use of electrostatic spray guns in their base and clear coat booths (both manual & robotic ones). This represents BACT for plastic parts coating with both base and clear coats." A violation will be cited for not using the required spray gun equipment on the clearcoat booth. Once made aware of this, Lacks personnel began immediate steps to obtain the proper equipment. After each application, parts go through a flash-off zone.

All spray booths use down-draft water-wash particulate control which was working properly at the time of the inspection. All booths have airflow going into the booths which is verified on an annual basis and reported to the AQD. The last test was conducted on 4/22/15. The company has a computer system which monitors booth airflow and will show an alarm if the airflow is going out of the booth.

The company's paint flush system is a mostly closed loop system; the paint spray nozzles are placed in an enclosed unit, then the flush solvent is drained into a sealed drum. Waste solvent is pumped out of the booth to a carrier drum which is then placed in a larger tote. Purge and cleanup solvent emission losses appear to be minimized.

#### Regenerative Thermal Oxidizer:

All automatic booths have 90% re-circulated air while 10% is captured and destroyed by the RTO. Based on an April 2012 stack test, the RTO has a destruction efficiency of 99.35%. The RTO is installed and appeared to be operating as designed. It is noted that the company replaced the existing RTO in 2014. This activity did not require a permit because it was exempt under Rule 285(d).

The company continuously monitors and records the temperature of the RTO using a circular chart and thermocouple; a new chart is started every Monday. The chart recorder was last calibrated on 4/11/15 which is required in the ROP as part of the CAM requirements.

During the inspection the RTO was operating at a combustion chamber temperature around 1,493°F which is above the 1,400°F minimum temperature limit in the permit. Spraying operations are set to shutdown if the temperature of the RTO goes below 1,450°F. The company keeps adequate records to document maintenance activities on the RTO. In addition, the company has a computer system that displays and stores continuous temperature and operating information for the RTO. Staff reviewed RTO chart records from September 2014 through August 2015 on site. There were three instances since January 1, 2015 that were reported to AQD where there were problems with the paper in the chart recorder and the paper chart did not correctly record the temperature. However, because there is a redundant monitoring system, the company could verify the proper operation of the RTO.

Also, the facility relies heavily on the interlock system to shutdown spraying operations when the temperature of the RTO falls below 1,400°F. Shutting down the coating line minimizes emissions should the RTO not operate in the compliant monitoring range. Per CAM and the ROP, the facility conducted a test in August 2014 to verify that the interlock system is working by faulting out the system. At that time, AQD staff observed that the spray systems did indeed shutdown when the RTO temperature dropped below 1,400°F.

The RTO is vented through a stack 45.0 ft. above ground. The manual booths are vented uncontrolled to the ambient air, through 80 ft. stacks. All stacks are in compliance with required dimensions.

#### Paint East Emissions:

The company uses an automated system and various spreadsheets for calculating and recording emissions. Emissions for the period of August 2014 through July 2015 are as follows (also see attached records):

Emission Unit	Limit	Actual	Comment
FGEASTPAINT	45.0 pounds/hour	< 19.16 pounds/hour (on 2-20-15)	pass
FGEASTPAINT	11.1 tons/month	< 2.76 tons/month	pass
FGEASTPAINT	111.6 tons/365 day-rolling	18.55 tons/365-rolling limit	pass

EUPRIMEMANUAL	45.0 tons/12-month rolling	9.93 tons	pass
EUBASEMANUAL	60.0 tons/12-month rolling	0.37 tons	pass
EUCLEARMANUAL	30.0 tons/12-month rolling	6.40 tons	pass

Purge and clean-up usage are calculated manually for each manual booth. Purge and cleanup emissions for the entire coating line for the reporting period were 0.0 tons. Therefore, emissions from the manual booths including purge and clean-up solvents are well below applicable limits. The company is maintaining all coating usage records in accordance with the permit. (see attached records) In addition, the company annually verifies the VOC content of the five most frequently used coatings, plus 2% of remaining coatings. The last Method 24 analysis was conducted in May 2015.

**FGRULE290:**

The facility has a waste solvent recovery distillation unit used to recover flush and purge solvents used on the coating lines. The company has demonstrated that this equipment is exempt under Rule 290. VOC emissions from the solvent distillation unit are typically below zero pounds per month because of the monthly calculation methodology. Essentially because of flush practices, the company is recovering almost 100% of the solvent in the distillation process.

**FGRULE287:**

It is noted that there is one small dry filter sample booth which is used on a limited basis to test coatings on parts. This booth is vented to the ambient air uncontrolled. In addition, there is a booth used for programming the robots. Filters were installed on the booth; however, no painting is conducted in this booth. Each booth is considered exempt from permitting. These booths are in compliance with Rule 287(c) requirements.

**PAINT WEST (ROP Section 1)**

The 52nd Paint West facility consists of eight robotic booths that apply resist coatings and ten manual booths that apply top coatings to exterior plastic automotive parts. All of the robotic booths are recirculating booths with emissions captured and destroyed in an RTO. This plant also has several solventless mask washers.

**O&M Plan:**

The company operates all emission units at Paint West in accordance with the O&M Plan dated July 15, 2014.

**FG-WESTROBOPAINT:**

The company has eight robotic spray booths used to apply resist coatings. The parts are masked and the resist coating is applied so the part can be plated. Each booth has two robot applicators and two downdraft dry filter exhaust points. Each booth uses HVLP spray guns in accordance with the permit.

All dry filters on the robot booths are changed once per shift and the filters appeared to be installed and maintained properly.

Each auto booth recirculates approximately 80% of the air, the remaining exhaust goes to the RTO. These booths are required to have all airflow at each natural draft opening (NDO) going into the booth. The facility is also required to determine the airflow of NDOs using a smoke tube method on a semi-annual basis. The last test was conducted on 6/22/15. All airflows were into the booth at NDOs during the last test.

**RTO:**

The RTO is installed and appeared to be operating as designed. The RTO combustion chamber temperature was operating around 1,498°F which is above the 1,400°F minimum temperature limit in the permit. The temperature is monitored by use of a thermocouple located in the combustion zone between the two regenerative columns of the oxidizer. This is consistent with the CAM Plan. The company continuously monitors and records the temperature of the RTO using a circular chart (which is changed every week) and a thermocouple. In addition, this RTO has a computer monitoring system that displays and stores continuous temperature and operating information for the RTO. The company had one occasion since January 1st where the paper chart had failed. The company has additional documentation to show that the RTO was operating properly despite the problem with the paper chart recorder.

AQD staff reviewed RTO chart records from August 2014 through July 2015 on site. Any occurrences where the temperature was below the required temperature were documented on the chart and work orders identified. The RTO is interlocked with the paint booths so that if the RTO malfunctions, the booths are shutdown. Per CAM and the ROP, the facility conducted a test in August 2014 to verify that the interlock system is working by faulting out the system. At that time, AQD staff observed that the spray systems did indeed shutdown when the RTO temperature dropped below 1,400°

F.

The company has implemented and is following a preventative maintenance plan in accordance with the ROP No. MI-ROP-N2079-2012. No visible emissions were observed and all stacks appeared to be within permitted dimensions. It is noted that based on an April 2012 stack test, the destruction efficiency of the RTO was determined to be 96.37%.

**FG-WESTMANUAL:**

FG-WEST MANUAL consists of ten manual spray booths and one bake oven used to apply resist coat and finish coat. All guns are equipped with HVLP nozzles. All the manual booths are vented to the ambient air uncontrolled. The filters were installed and maintained properly.

For FGWESTMANUAL the company continuously monitors and records the temperature of the curing oven using a circular chart to ensure that the temperature is below 194°F. The bake oven typically runs below 170°F.

**Paint West Emissions:**

The company uses a database for calculating and recording emissions. See attached records. Based on company records, VOC emissions for the period of August 2014 through July 2015 were as follows:

Emission Unit	Limit	Actual	Comment
FGWESTMANUAL	460 pounds/day	< 241.9 pounds/day (10-7-15)	Pass
FGWESTMANUAL	5.8 tons/month	< 0.8 tons/month (Aug. 2012)	Pass
FGWESTMANUAL	70.0 tons/12-month rolling	8.7 tons/12-month rolling	Pass
FGWESTMANUAL	5.75 lb/gal Red/black	< 5.21 lb/gal	Pass No coatings exceeded 5.21 lb/gal.
FGWESTMANUAL	5.0 lb/gal Non-Red/black	< 5.0 lb/gal	All coatings were at or less than 5.0 lb/gal.
FGWESTROBOPAINT	80 pounds/day	< 53.65 pounds/day (7-13-15)	Pass
FGWESTROBOPAINT	1.0 tons/month	< 0.26 tons/month	Pass
FGWESTROBOPAINT	11.7 tons/12-month rolling	2.5 tons/12-month rolling	Pass

The company uses the "worst case" VOC data to determine the VOC content of coatings. VOC data is recorded using the highest VOC content on a per batch basis. In addition, the company verifies the VOC content of the five most frequently used coatings, plus 2% of remaining coatings. The last Method 24 analysis was conducted in May 2015.

**FG-WESTMISPAINT:**

In the ROP, this flexible group consists of the strip tank (EUWESTSTRIPTANK) and miscellaneous cleanup operations from the paint kitchen (EUWESTPAINTKITCHEN). However, the emission limits in the ROP basically cover the strip tank. AQD staff verified that the strip tank has been removed from the facility. Therefore, the company should reevaluate this emission unit in the ROP and request changes where appropriate.

**FGSUBPARTPPPP:**

In order to comply with the Plastic Parts Surface Coating NESHAP, the company is using the emission rate without add-on control option. Therefore, the company has to meet a total HAP emission limit of 0.16 pounds per pound of coating solids for all coating operations. The company has demonstrated that it is calculating the mass fraction of organic HAP for each coating, the mass fraction of coating solids for each coating, and the density. The organic HAP emissions from August 2014 through July 2015 did not exceed 0.04 lbs which is below the 0.16 lbs limit. HAP records for all facilities are attached.

52nd Mold (ROP Section 1)

The 52nd Mold facility consists primarily of molding machines exempt from air use permitting under Rule 286(b). No equipment has been added requiring a permit.

Source-wide:

VOC emissions from the entire stationary source from August 2014 through July 2015 were 57.4 tons which is well below the source-wide limit of 249 tons per rolling 12-month period.

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SUMMARY

A violation will be cited for the clearcoat spray equipment. The company is advised to resubmit certification reports documenting the spray gun issue. Records obtained during the inspections will be placed in the AQD files along with this report.

NAME *Paul H. Ryan*

DATE *9/30/15*

SUPERVISOR *PAB*