

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N249771588

FACILITY: MARCH COATINGS VENTURES LLC		SRN / ID: N2497
LOCATION: 160 SUMMIT, BRIGHTON		DISTRICT: Lansing
CITY: BRIGHTON		COUNTY: LIVINGSTON
CONTACT: Mark Tomasik , VP of QA and E, H & S		ACTIVITY DATE: 04/04/2024
STAFF: David Rauch	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: An unannounced routine inspection of March Coatings was conducted to ensure the site is in compliance with PTI 427-90A, 80-03, 348-01.		
RESOLVED COMPLAINTS:		

N2497 March Coatings Ventures

On April 4, 2024 the State of Michigan's (SOM), Environment Great Lakes and Energy (EGLE), Air Quality Division (AQD), conducted a routine inspection of March Coatings Ventures. The facility location is at 160 Summit St. Brighton, MI.

The Environmental Contact:

Mark Tomasik, EHS, 810-229-6464 x 221, mtomasik@marchcoatings.com

Facility Description:

March Coatings is a facility that specializes in coatings and paint for automotive parts including brake rotos, frame components, and seat components.

Regulatory Overview:

March coatings is an Opt-Out Source that has the potential to emit more than a minor source but is below the threshold for a major source. March coatings has 3 active permits for the coating process and a fluidized bed for cleaning equipment. The site must record HAPs for their Opt-Out permit but does not currently have HAPs emissions.

Applicable Regulations:

80-03: Relocation of fluidized sand bed, Active Permit

348-01: General Coating Line, Active Permit

427-90A: 3 spray booths, with HAP Opt-Out Limits, Active Permit

Fee Status:

This facility is a category F facility and is not fee subject.

Facility History:

The last VNs were issued in 2017 when Nathanael Hude conducted a routine inspection of the facility. There have not been any VN's or odor complaints for this site since 2017.

Location:

March Coatings is located at 160 Summit St. Brighton, MI. The site is in a residential and industrial area of Brighton. To the East of the facility is an industrial park with various businesses and the rest of the surrounding area is a residential neighborhood.

Inspection:

Arrived at the facility at 10:45AM and was met in the lobby by Mark Tomasik. Loren Hicks and I were then taken into Mark’s office where we discussed each special condition of each permit. Once we discussed all of the record and SDS requests, we went into the plant to observe all of the paint lines and burn off equipment. We toured the plant and then were able to wrap up with a final questions and request of information based on the inspection and required records. While going through the plant it was noted waste material is kept in closed containers, and filters appeared to be installed properly. Used filters are hauled out by a waste company.

While on site 3 of the lines were in operation, Rotor 2 was not in operation.

Exempt Equipment

EU-SPINNERHANGAR: is a metal shot device used for removing paint which is controlled by a baghouse and internally vented near the EUBURNOFF line; exemption R336.1285(2)(l)(vi)(B).

EU-TUMBLER: is a metal shot device used for removing paint which has no control but is internally vented near the EUBURNOFF line; exemption R336.1285(2)(l)(vi)(B).

EU-INLINEBLAST: is a metal shot device used for removing paint which is controlled by a baghouse and internally vented near the EUBURNOFF line; exemption R336.1285(2)(l)(vi)(B).

EU-BUFFING: is a station where parts are buffed by hand to remove paint that leaks through sealed areas; exemption R336.1285(2)(l)(vi)(B).

EU-Welding: a small welding station in the parts area. R336.1285(2)(l)(vi)(B).

Facility Record Keeping:

Lbs of VOC per paint line.

	Rotor (lbs)	Muffler (lbs)	Rotor 2 (lbs)	Mono (lbs)
Jan-21	213	56	0	136
Feb-21	96	42	0	178.5
Mar-21	210	53	0	170

Apr-21	117	31	0	246.5
May-21	31.5	14	0	105
Jun-21	84	14	0	0
Jul-21	105	28	0	212.5
Aug-21	216	89.6	0	170
Sep-21	177	8.4	0	238
Oct-21	157.5	36.4	0	357
Nov-21	93	36.4	0	192.1
Dec-21	60	47.6	0	76.5
Total (Tons)	1560 (0.78)	456.4 (0.23)	0(0)	2082.1 (1.04)

	Rotor	Muffler	Rotor 2	Mono
Jan-22	195	50.4	0	255
Feb-22	289.5	14	0	212.5
Mar-22	84	14	0	212.5
Apr-22	136.5	14	0	195.3
May-22	189	28	0	170
Jun-22	388.5	42	0	255

Jul-22	336	28	0	122.6
Aug-22	420	42	0	204
Sep-22	336	42	0	204
Oct-22	430.5	42	0	187
Nov-22	483	28	0	200.1
Dec-22	367.5	28	0	187
Total	3655.5 (1.83)	372 (0.19)	0 (0)	2405 (1.2)

	Rotor	Muffler	Rotor 2	Mono
Jan-23	467	42	0	187
Feb-23	447	56	0	409
Mar-23	670	98	0	247
Apr-23	406	84	0	255
May-23	305	84	0	264
Jun-23	798	56	0	140
Jul-23	326	28	0	204
Aug-23	334	70	0	230
Sep-23	397	56	0	264

Oct-23	476	42	0	162
Nov-23	396	56	0	238
Dec-23	276	56	0	187
Total	5298(2.65)	728 (0.36)	0 (0)	2787 (1.4)

Reviewed records on site as well as receiving previous years records via email. Upon review of the SDS forms for the paint used. VOC content compared to gallons of product used to determine VOC emissions. Site is in compliance with emission limits.

PTI 427-90A

SC1.1 VOC Limit, 30.1 tons per year.

RESULT: Compliance- Records review shows site is well under limit.

SC1.2 VOC Material Limit, 3.5lbs/gal

RESULT: Compliance- Records review shows paint VOC contents at 2.8lbs/gal.

SC1.3 The ethyl benzene content (CAS 100-41-4) of all coatings used in FGCOATING shall not exceed 0.5 pounds per gallon of coating. The permittee shall not use more than 8,000 gallons of ethyl benzene containing coatings per 12-month rolling timeframe. (R 336.1225, R 336.1901)

RESULT: Compliance- records show no ethyl benzene is used on site.

SC1.4 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 336.1702(a))

RESULT: Compliance- based on observations the site is capturing and storing waste properly.

SC1.5 The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. (R 336.1370)

RESULT: Compliance—filters are disposed of in a manner that minimizes introduction of air contaminants.

SC1.6 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 336.1225, R 336.1702(a), R 336.1901)

RESULT: Compliance- while observing the manual spray guns and robot spray guns on the two separate lines, it was observed there was not much overspray.

SC1.7 The permittee shall not operate FGCOATING unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. (R 336.1301, R 336.1331, R 336.1901, R 336.1910)

RESULT: Compliance- all filters were installed as required during the inspection.

SC1.8 The permittee shall equip and maintain FGCOATING with HVLP or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. (R 336.1702(a))

RESULT: Compliance-site emailed specs for HVLP guns after the inspection.

SC1.9 The permittee shall determine the VOC content, water content and density of any material, as applied and as received, using federal Reference Test Method 24. Upon prior written 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 336.1225, R 336.1702(a), R 336.1901)

RESULT: Compliance- manufacturers data is being used via SDS showing a VOC content of 2.8lbs/gal VOC.

SC1.10 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 recordkeeping, reporting or notification special condition. (R 336.1225, R 336.1702, R 336.1901)

RESULT: Compliance- records review on site as well as records requested for 2021-2023 were being maintained.

SC1.11 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 for a period of at least five years and make them available to the Department upon request. (R 336.1225, R 336.1702(a), R 336.1901)

RESULT: Compliance- SDS's were on hand and made available when requested.

SC1.12 The permittee shall keep the following information on a monthly basis for FGCOATING:

- a) Gallons (with water) of each material used.
- b) VOC content (minus water and with water) of each material as applied.
- 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 for a period of at least five years and make them available to the Department upon request. (R 336.1225, R 336.1702(a), R 336.1901)

RESULT: Compliance- records provided after the inspection.

SC1.13 The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with FGCOATING:

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 for a period of at least five years and make them available to the Department upon request. (R 336.1225, R 336.1702(a), R 336.1901)

RESULT: Compliance- records were reviewed and while on site Mark shared the site still uses a solvent known as Parachlorobenzotrifluoride (PCBTB), CAS 98-56-6. This solvent is listed as a non-VOC and thus doesn't have any emissions, it is also non-HAP.

SC1.14 The permittee shall keep the following information on a monthly basis for FGCOATING:

a) Gallons (with water) of each ethyl benzene containing material used.

b) Where applicable, gallons (with water) of each ethyl benzene containing material reclaimed.

c) The ethyl benzene content in pounds per gallon of each material used.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1225, R 336.1901)

RESULT: Compliance- record review shows no ethyl benzene is being used on site.

SC1.15a SVLINE1, max diameter in inches 28.0, minimum height above ground level 35.0 feet

RESULT: Compliance- based on visual of the stacks. Did not take range finder to confirm height.

SC1.15a SVLINE2, max diameter in inches 24.0, minimum height above ground level 35.0 feet

RESULT: Compliance- based on visual observation of stacks.

SC1.15a SVLINE3, max diameter in inches 24.0, minimum height above ground level 35.0 feet

RESULT: Compliance- based on visual observation of the stacks.

SC1.15a SVOVEN1, max diameter in inches 12.0, minimum height above ground level 41.5 feet

RESULT: Compliance- Compliance- based on visual observation of the stacks.

SC1.15a SVOVEN2, max diameter in inches 12.0, minimum height above ground level 42.0 feet

RESULT: Compliance- Compliance- based on visual observation of the stacks.

FGFACILITY

SC2.1a Emission Limit, < 9.0 tpy individual HAP

RESULT: Compliance- based on the records reviewed and provided, it appears March Coatings does not use solvents or paints containing HAPs

SC2.1b Emission Limit, < 22.5 tpy aggregate HAP

RESULT: Compliance- based on the records reviewed and provided, it appears March Coatings does not use solvents or paints containing HAPs

SC2.2 The permittee shall determine the HAP content of any material as received and as applied, 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))

RESULT: Compliance- based on the records reviewed and provided, it appears March Coatings does not use solvents or paints containing HAPs

SC2.3 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 recordkeeping, reporting or notification special condition. (R 336.1205(3))

RESULT: Compliance- based on the records reviewed and provided, it appears March Coatings does not use solvents or paints containing HAPs

SC2.4 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 the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1205(3))

RESULT: Compliance- based on the records reviewed and provided, it appears March Coatings does not use solvents or paints containing HAPs

PTI 348-01

FG-COATING

Coating Line General Permit issued for EU-10602 or the 4" Monorail

This line is used for coating frame, suspension, and seat components. The process starts with 7 stages of washing prior to a dip tank. The stages are as follows: spray clean, immersion clean, city water rinse, spray conditioning rinse, zinc phosphate tank, city water rinse, reverse osmosis water rinse, second reverse osmosis water rinse, parts are then e-coated, receive another rinse and finally make two passes through the natural gas fired curing oven.

SCI.1 Emission Limit, 2000lbs/month VOC

RESULT: Compliance-record review shows limit well below the 2000lbs/month limit, site did not exceed 1000lbs per records.

SCI.2 Emission Limit, 10tpy VOC

RESULT: Compliance- records review shows site emitted less than 5 tons of VOCs per year from 2021-2023. 2024 is trending towards the same.

SCII Material Limits: NA

SCIII.1 The permittee shall capture all purge/clean-up solvents and waste coatings from all coating applicators used in FG-COATING. The permittee shall store these materials in closed containers and shall dispose of them in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1702(d))

RESULT: Does not apply as the line uses a dip rather than spray.

SCIV1. The permittee shall equip and maintain FG-COATING with high volume-low pressure (HVLP) spray applicators or comparable technology with equivalent transfer efficiency (e.g., electrostatic spray, dip, testing). (R 336.1702(d))

RESULT: Does not apply as the line uses a dip rather than spray.

SCIV2. The permittee shall not operate any spray application unless particulate control (dry filters or a water curtain) is installed, maintained and operated in a satisfactory manner. (R 336.1331)

RESULT: Does not apply as the line uses a dip rather than spray.

SCIV3. A thermal oxidizer or catalytic oxidizer may be installed, maintained and operated in a satisfactory manner to meet the requirements of this general permit. If a thermal oxidizer or catalytic oxidizer is used for FG-COATING, satisfactory operation requires an overall minimum of 76 percent reduction of VOC emissions to the atmosphere. (R 336.1224, R 336.1702(d))

a) Satisfactory operation of a thermal oxidizer includes maintaining a minimum combustion chamber temperature of 1400°F and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, an average temperature of 1400°F based upon a three-hour rolling average may be used.

b) Satisfactory operation of the catalytic oxidizer includes maintaining a minimum catalyst bed inlet temperature of 600°F. In lieu of a minimum temperature, an average temperature of 600°F based upon a three-hour rolling average may be used.

RESULT: Does not apply as a catalytic / thermal oxidizer is not installed.

SCIV4. For a coating line using a thermal oxidizer: 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 FG-COATING. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. (R 336.1201a(1))

RESULT: Does not apply as a catalytic / thermal oxidizer is not installed.

SCIV5. For a coating line using a catalytic oxidizer: The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device to continuously monitor the inlet and outlet temperatures of the catalytic oxidizer catalyst bed during operation of FG-COATING. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. (R 336.1201a(1))

RESULT: Does not apply as a catalytic / thermal oxidizer is not installed.

SCV1. Within 60 days of notification by the AQD, verification of VOC emissions and VOC content (in pounds per gallon) of any coating, reducer or purge/clean-up solvent, as applied or as received, using federal Reference Test Method 25A, Method 24 or other EPA approved reference method, may be required for continued operation. Verification of the emission rates includes the submittal of a complete report of the test results to the AQD with 60 days following the last date of the test. Upon prior written approval by the AQD District Supervisor, VOC content may alternatively be determined from manufacturer's formulation data. If the Method 25A or Method 24 should differ from the formulation values, the permittee shall use the Method 25A or Method 24 results to determine compliance. (R 336.2001, R 336.2003, R 336.2004, R 336.1702(d))

RESULT: Compliance- record review shows site can provide SDS forms for compliance.

SCVI1. For a coating line using a thermal oxidizer: The permittee shall monitor the temperature in the combustion chamber of the thermal oxidizer and record the temperature on a continuous basis, during operation of FG-COATING. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. (R 336.1201a(1))

RESULT: Does not apply as a catalytic / thermal oxidizer is not installed.

SCVI2. For a coating line using a catalytic oxidizer: The permittee shall continuously monitor the inlet and outlet temperatures of the catalytic oxidizer catalyst bed during operation of FG-COATING. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. (R 336.1201a(1))

RESULT: Does not apply as a catalytic / thermal oxidizer is not installed.

SCVI3. The permittee shall keep the following information on a monthly basis for FG-COATING:

- a) Purchase orders and invoices for all coatings, reducers, and purge/clean-up solvents.**
- b) VOC content, in pounds per gallon, of each coating, reducer and purge/clean-up solvent used.**
- c) Gallons of each coating, reducer and purge/clean-up solvent used and reclaimed.**
- d) VOC mass emission calculations determining the monthly emission rate for each coating line, in tons per calendar month, using the method specified in Appendix B.**
- e) VOC mass emission calculations determining the annual emission rate for each coating line, in tons per 12-month rolling time period as determined at the end of each calendar month, using the method specified in Appendix B.**

The permit shall keep all records in the format specified in Appendix B. The permittee shall keep all records and make them available to the Department upon request. (R 336.1201a(1), R 336.1225, R 336.1702(d))

RESULT: Compliance- records were reviewed on site as well as sent via email for review.

SCVI4. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, 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 and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702(d))

RESULT: Compliance- SDS's of the paints requested were received via email.

SCVI5. For a coating line using a thermal or catalytic oxidizer: The permittee shall keep records of the date, duration and description of any malfunction of the control equipment, any maintenance performed, any replacement of catalyst and any testing results. (R 336.1201a(1))

RESULT: Does not apply as a catalytic / thermal oxidizer is not installed.

SCVI6. For a coating line using a thermal oxidizer: The permittee shall keep, in a satisfactory manner, operating temperature records for the thermal oxidizer as required by SC VI.1. If the measured operating temperature of the thermal oxidizer falls below 1400°F during operation of FG-COATING, the permittee may demonstrate compliance based upon a three-hour average temperature, by calculating the average operating temperature for each three hour period which includes one or more temperature readings below 1400°F. The permittee shall keep all records and make them available to the Department upon request. (R 336.1201a(1))

RESULT: Does not apply as a catalytic / thermal oxidizer is not installed.

SCVI7. For a coating line using a catalytic oxidizer: The permittee shall keep, in a satisfactory manner, operating temperature records for the catalytic oxidizer as required by SC VI.2. If the measured operating temperature of the catalytic oxidizer falls below 600°F during operation of FG-COATING, the permittee may demonstrate compliance based upon a three-hour average temperature, by calculating the average operating temperature for each three hour period which includes one or more temperature readings below 600°F. The permittee shall keep all records and make them available to the Department upon request. (R 336.1201a(1))

RESULT: Does not apply as a catalytic / thermal oxidizer is not installed.

SCVII Reporting: NA

SCVIII1. The exhaust gases from FG-COATING shall be discharged unobstructed vertically upwards to the ambient air at exit points not less than one and one half times the building height (from ground level to point of discharge). (R 336.1225)

RESULT: Compliance- Based on visual measures the site is in compliance.

SCIX1. The permittee shall not replace or modify any portion of FG-COATING, including control equipment or coatings, nor install additional coating lines (or any portion of, including control equipment or coatings) unless all of the following conditions are met: (R 336.1201)

a) The permittee shall update the general permit by submitting a new Process Information form (EQP5759) to the Permit Section and District Supervisor, identifying the existing and new equipment a minimum of 10 days before the replacement, modification or installation of new equipment.

b) The permittee shall continue to meet all general permit to install applicability criteria after the replacement, modification or installation of new equipment is complete.

c) The permittee shall keep records of the date and description of the replacement or modification, installation of new equipment, or any coating change. All records shall be kept on file for a period of at least five years and made available to the Department upon request.

RESULT: Compliance- No changes to equipment have occurred and the VOC contents have been recorded by the site, no changes have been made.

FG-SOURCE

SCI.1 Emission Limit, 30tpy VOC

RESULT: Compliance- records were reviewed and the site is well below 30tpy.

SCII Material Limits: NA

SCIII. Process/Operational Restrictions: NA

SCIV. Design/Equipment Parameters: NA

SCV. Testing/Sampling: NA

SCVI1. The permittee shall keep VOC mass emission calculations, on a monthly basis for FG-SOURCE determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month, for all coating lines and associated purge and clean-up operation at the

source. The permittee shall keep all records in the format specified in Appendix B and make them available to the Department upon request. (R 336.1201a(1), R 336.1225, R 336.1702(d))

RESULT: Compliance- records reviewed, site is maintaining

PTI 80-03

EUBURNOFF: SEGHERS Fluid Clean Fluidized Bed Type B18.08.05 cleaning furnace for removal of coating residues from metal tools, parts and fixtures. Emission controls include a furnace afterburner zone and a cyclone separator.

Information from the Permit Application Evaluation: fluidized bed cleaning system which is designed to remove cured coatings from metal parts. The system gasifies organic materials and uses the sand as a mechanical cleaner to remove residues from the tooling. The process involves heating the metal parts in the fluidized bed to approx. 900 degrees F, an afterburner zone is created above the sand bed by igniting gas at the beds surface, the vapor is heated to at least 1300 degrees F with a min of 1.6 seconds retention time where the smoke/vapor combusts into CO₂ and H₂O. The exhaust gases are drawn through a cyclone prior to being discharged in order to remove any PM.

This device is used for cleaning paint off from the metal dip line racks associated with 348-01.

SC1.1 Visible emissions from EUBURNOFF shall not exceed a six-minute average of five percent opacity.

RESULT: Compliance- no visual emissions were observed during inspection.

SC1.2 The permittee shall burn only natural gas in EUBURNOFF. [R336.1901]

RESULT: Compliance- natural gas is the only supply for this device.

SC1.3 The permittee shall not process any material in EUBURNOFF other than cured paints, oil or grease on metal parts, racks and/or hangers. No rubber, plastics, uncured paints, or any other materials containing sulfur or halogens (chlorine, fluorine, bromine, etc.) such as plastisol, polyvinyl chloride (PVC), or Teflon may be processed in EUBURNOFF. [R336.1224, R336.1225, R336.1901]

RESULT: Compliance- did not observe any of the above contaminants in the fluidized bed.

SC1.4 The permittee shall not load any transformer cores, which may be contaminated with PCB-containing dielectric fluid, wire or parts coated with lead or rubber, or any waste materials such as paint sludge or waste powder coatings into EUBURNOFF. [R336.1224, R336.1225, R336.1901]

RESULT: Compliance- did not observe any of the above contaminants in the fluidized bed.

SC1.5 The permittee shall not operate EUBURNOFF unless the afterburner zone is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the afterburner zone includes maintaining a minimum temperature of 1100°F and a minimum retention time of 1.6 seconds. [R336.1224, R336.1225, R336.1301, R336.1901, R336.1910]

RESULT: Compliance, records reviewed and charts are being maintained on site.

SC1.6 The permittee shall not operate EUBURNOFF unless the cyclone separator is installed and operating properly. [R336.1224, R336.1225, R336.1301, R336.1901, R336.1910]

RESULT: Compliance- observed cyclones associated with this device for PM control.

SC1.7 The permittee shall not operate EUBURNOFF unless the sand bed is preheated to 850 F before parts are loaded into the sand bed for processing. [R336.1224, R336.1225, R336.1301, R336.1901, R336.1910]

RESULT: Compliance-site has temperature charts to show proper operation.

SC1.8 The permittee shall equip and maintain EUBURNOFF with an automatic temperature control system for the furnace. [R336.1224, R336.1225, R336.1301, R336.1901, R336.1910]

RESULT: Compliance: site has an automatic temperature control system that shuts down the unit if it gets too hot.

SC1.9 The permittee shall equip and maintain EUBURNOFF with an interlock system that shuts down the furnace when the automatic temperature control system for the furnace is not operating properly. [R336.1224, R336.1225, R336.1301, R336.1901, R336.1910]

RESULT: Compliance.

SC1.10 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature in the afterburner zone on a continuous basis. [R336.1224, R336.1225, R336.1901, R336.1910]

RESULT: Compliance, site has a monitoring system installed.

SC1.11 The permittee shall calibrate the thermocouples associated with the sand bed and afterburner zone at least once per year. [R336.1224, R336.1225, R336.1901, R336.1910]

RESULT: Compliance, site uses annual calibrations with Honeywell to ensure proper monitoring. October 2023.

SC1.12 All records shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. [R336.11224, R336.1225, R336.1901, R336.1910]

RESULT: Compliance. Records reviewed on site.

SC1.13 The permittee shall keep, in a satisfactory manner, continuous temperature data records for the EUBURNOFF afterburner zone. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1224, R336.1225, R336.1901, R336.1910]

RESULT: Compliance, the site maintains temperature wheels on site.

SC1.14 The permittee shall keep, in a satisfactory manner, records of the date, duration, and description of any malfunction of the control equipment, any maintenance performed and any testing results for EUBURNOFF. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1910, R336.1912]

RESULT: *Compliance, records reviewed on site*

SC1.15 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material being removed from the parts being processed in EUBURNOFF. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1224, R336.1225, R336.1901]

RESULT: *Compliance, facility sent SDS forms via email.*

SC1.16 SVBURNOFF max diameter in inches 14.0, minimum height above ground level 45.0 feet

RESULT: *Compliance- measurements were not taken though based on observation from the ground it appears this condition is being met.*

Conclusions:

Following the in-person inspection as well as the off site record review it can be determined March Coatings Ventures is in compliance with their PTIs; 348-01, 427-90A, and 80-03. There were no odors or visual emissions that were observed on site.

NAME David Rauch

DATE 06/07/2024

SUPERVISOR RB