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

N642033406

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| **FACILITY:** AAR Mobility Systems | | **SRN / ID:** N6420 |
| **LOCATION:** 1405 Sixth Ave, CADILLAC | | **DISTRICT:** Cadillac |
| **CITY:** CADILLAC | | **COUNTY:** WEXFORD |
| **CONTACT:** Ed Connell , EHS Specialist | | **ACTIVITY DATE:** 02/18/2016 |
| **STAFF:** Rob Dickman | **COMPLIANCE STATUS:** Compliance | **SOURCE CLASS:** SM OPT OUT |
| **SUBJECT:** Scheduled inspection of this opt out source. | | |
| **RESOLVED COMPLAINTS:** | | |

**This facility manufactures shipping containers for the U.S. military. This permit is for two coating booths and associated bake ovens. The permit indicates emissions from these units are uncontrolled. However, the facility does employ dry fabric filter control common with this type of process. Only one of the booths, the south booth, has been in operation the last 12 months and it has operated very minimally as demonstrated by the facility records. It is unclear to me and AAR staff whether the operating booth is EUBOOTH1 or EUBOOTH2, however, the requirements for each are the same. For the sake of this reporting, we will call the south booth number 1. Neither booth was in use at the time of the inspection.**

**All records are kept electronically via a system known as ACIMS and I reviewed these records on site.**

**FGCOATINGS**

**I. EMISSION LIMITS**

1. **VOC emissions are limited to 40 tons per year based on a 12 month rolling time period and 220 pounds per calendar day. Records kept indicate less than a ton per year based on a 12 month rolling time period and an average of about four pounds per calendar day with no day higher than 10 pounds.**

2. **Acetone emissions are limited to 7.2 tons per year based on a 12 month rolling time period. Records kept indicate as of December of 2015 there was 0.033 tons per year based on a 12 month rolling time period.**

3. **P-chlorobenzotrifluoride emissions are limited to 90 #/day. Records kept indicate an average of 0.48 pounds per calendar day.**

**II. MATERIAL LIMITS**

**1. VOC content is limited to 3.5 #/gal applied. The facility uses military specific coatings that are batch tested. Data regarding this was available on site. All coatings used are below this content limit.**

**2. Gallons of p-chlorobenzotrifluoride containing coating is limited to 300 #/day. Records indicate an average of about 1 gallon per day over the last 12 months.** 90#

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. **The permittee is required to capture and dispose properly all waste coatings and solvents. It was noted that a closed, well labelled container for this purpose was located just outside Booth 1.**

2. **The permittee is required to dispose of all filters in an acceptable manner. The standard procedure for disposal of filters is to place dry used filters in to containment for disposal at a Class II landfill (Wexford Landfill).**

3. **The permittee is required to handle all VOC and / or HAP containing materials in a manner to minimize the generation of fugitive emissions. All paint kitchen containers were closed, all filters were in place, guns used in the booths are HVLP guns, all waste was stored in closed containers.**

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee is not allowed to operate either booth (1 and 2) unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. All filters were in place at the time of the inspection and appeared in very good condition. The facility uses pressure drop indicators as a method to know when filters should be changed.

2. The permittee is required to use HVLP or equivalent technology in the coating booths. All guns used in each booth are HVLP.

V. TESTING/SAMPLING

1. VOC content is required to be determined by Method 24 or manufacturer's formulation data. The facility uses military specific coatings that are batch tested. Data regarding this was available on site.

VI. MONITORING/RECORDKEEPING

1. The permittee is required to keep emissions calculations by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. Emissions calculations were available through January of 2016.

2. The permittee is required to keep a current listing from the manufacturer of the chemical composition of each coating. The facility uses military specific coatings that are batch tested. Data regarding this was available on site.

3. The permittee is required to keep the following information on a monthly basis:
   a) Gallons (with water) of each coating used.
   b) VOC content (minus water and with water) of each coating 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.
   e) Hours of operation.

   All data listed above is kept via the ACIMS system. It was current and appeared complete.

4. The permittee shall keep the following information on a monthly basis:
   a) Gallons of each solvent, including acetone, used and reclaimed.
   b) VOC and/or acetone content, in pounds per gallon, of each solvent used.
   c) VOC and/or acetone mass emission calculations determining the monthly emission rate in tons per calendar month.
   d) VOC and/or acetone 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.
   e) Calculation of the percentage of purge solvents recovered, reclaimed, recycled or disposed of.

   All data listed above is kept via the ACIMS system. It was current and appeared complete. None of the purge or cleanup solvents are reclaimed or recycled at the facility. They are placed in barrels in secondary containment, manifested, and removed by an outside vendor.

5. The permittee shall keep the following information on a daily basis:
   a) Gallons (with water) of each p-chlorobenzotrifluoride containing material used.
   b) Where applicable, gallons (with water) of each p-chlorobenzotrifluoride containing material reclaimed.
   c) The p-chlorobenzotrifluoride content (with water) in pounds per gallon of each material used.
   d) P-chlorobenzotrifluoride mass emission calculations determining the daily emission rate in

pounds per calendar day.

All data listed above is kept via the ACIMS system. It was current and appeared complete.

VII. REPORTING – No reporting is required for this FG

VIII. STACK/VENT RESTRICTIONS

Both oven stacks are required to have a maximum diameter of 42 inches and a minimum height of 70 feet. The oven stacks appear to have not been recently modified and the parameters for them appear correct. In March of 2006, the stacks were raised to meet the minimum height requirement.

IX. OTHER REQUIREMENTS – There are no other requirements for this FG

FGFACILITY

I. EMISSION LIMITS

1. Individual HAP emissions are limited to 9 tpy based on a 12 month rolling time period. Records review indicates individual and aggregate HAPS emissions to be near zero.

2. Aggregate HAP emissions are limited to 22.5 tpy based on a 12 month rolling time period. Records review indicates individual and aggregate HAPS emissions to be near zero.

II. MATERIAL LIMITS – No material limits for this FG.

III. PROCESS/OPERATIONAL RESTRICTIONS – No process restrictions for this FG.

IV. DESIGN/EQUIPMENT PARAMETERS – No design parameters for this FG.

V. TESTING/SAMPLING

1. HAP content shall be determined by Method 311 or by manufacturer's formulation data. The facility uses military specific coatings that are batch tested. Data regarding this was available on site.

VI. MONITORING/RECORDKEEPING

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating and cleaning solvent. The facility uses military specific coatings that are batch tested. Data regarding this was available on site.

2. The permittee shall keep the following information on a monthly basis:

   a) Gallons or pounds of each material used.

   b) Where applicable, gallons or pounds of each material reclaimed.

   c) HAP content, in pounds per gallon or pounds per pound, of each 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.

All data listed above is kept via the ACIMS system. It was current and appeared complete.

VII. REPORTING – No reporting requirements for this FG.

VIII. STACK/VENT RESTRICTIONS – No stack restrictions for this FG.

**IX. OTHER REQUIREMENTS**

1. **The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart MMMM for Surface Coating of Miscellaneous Metal parts & Products. Per 63.3881(b), the facility is not a major source of HAP emissions as their potential to emit is limited by the permit to install. Therefore, this condition does not apply.**

**At the time of the inspection, this facility was in compliance with their air permitting.**

NAME _____ DATE 2/19/16 SUPERVISOR _____