N7067
Manilla

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

N706750416

FACILITY: LOC PAC INC		**SRN / ID:** N7067
LOCATION: 13505 HAGGERTY RD, PLYMOUTH		**DISTRICT:** Detroit
CITY: PLYMOUTH		**COUNTY:** WAYNE
CONTACT:		**ACTIVITY DATE:** 09/17/2019
STAFF: Jorge Acevedo	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION
INSPECTION REPORT

COMPANY NAME	**:LOCPAC**
FACILITY ADDRESS	**: 13505 Haggerty , Plymouth, MI 48170**
SRN	**: N7067**
SIC CODE	**: 3479**
EPA SOURCE CLASS	**: B**
EPA POLLUTANT CLASS : O	
LEVEL OF INSPECTION	**: PCE**
DATE OF INSPECTION	**: 09/20/19**
TIME OF INSPECTION	**: 10:00**
DATE OF REPORT	**: 09/29/19**
REASON FOR INSPECTION	**: Targeted Source**
INSPECTED BY	**: Jorge Acevedo**
PERSONNEL PRESENT	**: Gary Fleming, Plant Manager**
	: Jessica Johnson, Corporate Quality
FACILITY PHONE NUMBER	**: 734-453-2300**
FACILITY FAX NUMBER :	**734-453-5180**

INSPECTION NARRATIVE:

On September 20, 2019 I performed an unannounced partial compliance evaluation of LOCPAC. I arrived at 10:00 AM and observed the stacks, but did not see visible emissions. I proceeded to the main offices and met with Gary Fleming, Plant Manager, and Jessica Johnson, Corporate Quality. I spoke to them about the inspection and I gave them a brief summary about the inspection process. The last inspection was in 2015. LOCPAC has been in its current location since 2003..

LOCPAC was formed in 1985 and is a division of Loc Performance. LOCPAC provides in-house chemical agent resistant coating (CARC) painting and packaging services. This is the division of Loc Performance that is of concern to the Air Quality Division. CARC is a polyurethane paint that provides superior durability, extends service life for military vehicles and equipment, provides surfaces with superior resistance to chemical warfare agent penetration, and greatly simplifies decontamination.

All the emissions associated with LOCPAC come from their coating operations. Metal Parts are coated at the facility and many of their coated products are military based. After getting a history and an update since the last inspection of the facility and description of the facility's operations, we proceeded to the plant floor for

the inspection.

We proceeded to the machining section of the facility. There are several metal mills and lathes used to cut metal parts. None of the machines are ducted outside to the atmosphere. In addition, there is no plasma torch cutting taking place at the facility. There are several drill presses as well as some welding equipment used on a batch process. The drill press equipment and welding equipment are vented into the facility and out through a stack.

After observing the machining side of the facility, we proceeded to observe the coating lines. The facility contains two coatings line which includes a parts washer, blue wash primer, a primer, a top coat, and two ovens. The two ovens are fueled with natural gas. One line is not being used at the time and is used for air drying parts.

The beginning of the process begins with the parts washer. Parts are cleaned with hot water and then rinsed off. Water drains into the ground through a grate. The parts are dried off and masked to prevent overspray. The parts are run through a blue wash primer, which is used on bare metal and provides corrosion resistance and adhesion. In the past, the blue wash primer contained 50 % isopropyl alcohol, but that is no longer the case. The part is run through prime booth and coated using an electrostatic gun. The part is then run through an oven, which runs at 120° to 300° F depending on the weight of the part. The next phase is that it is coated with the top coat. Finally, it is dried using an oven.

At the time of my visit, there was coating taking place. I observed all the booths and the filters appeared to be in good condition. There were no gaps between the filters and the ductwork. Mr. Fleming explained that the filters are changed approximately daily and disposed of according to Hazardous Waste regulations, but it depends on the use of the line. Typically, it can be three to four days, but it is dependent on production. Also, all coatings were stored in covered containers.

Mr. Fleming explained that for each job, the painter writes down in a log how much coating was used. The log is tallied each week and sent to their consultant who calculates emissions.

At the end of the inspection, I asked for two years of records. Ms. Johnson said that she would email the records in the next couple of days. I left LOCPAC at 12:30PM. Records were received by the facility's consultant on October 8, 2019.

FACILITY BACKGROUND:
LOCPAC is the coating operation division of Loc Performance. LOCPAC coats metal parts with its coating line. Their primary customer is the military. The coating line consists of a parts washer, a wash primer, a prime booth, a topcoat booth, and two ovens.

COMPLAINT/COMPLIANCE HISTORY:
There have not been any citizen complaints registered.

OUTSTANDING CONSENT ORDERS:
None

OUTSTANDING LOVs
None

OPERATING SCHEDULE/PRODUCTION RATE:
This facility has one shift M-F. Coating occurs on one Line as of now.

PROCESS DESCRIPTION:
LOCPAC operates two coating lines consisting of a parts washer, three booths, and two ovens. Each unit has their own stack. The booths are controlled with filters to prevent overspray. The beginning of the process begins with the parts washer. Parts are cleaned with hot water and then rinsed off. Water drains into the ground through a grate. The parts are dried off and masked to prevent overspray. The parts are run through a blue wash primer, which is used on bare metal and provides corrosion resistance and adhesion. 50 % isopropyl alcohol is used when applying this primer. The part is run through prime booth and coated using an electrostatic gun. The part is then run through an oven. The next phase is that it is coated with the top coat. Finally, it is dried using an oven
EQUIPMENT AND PROCESS CONTROLS:

Equipment	Process Controls
3 Spray Booths	Dry Filters
2 Ovens	
Paint Spray Guns	High Volume Low Pressure (HVLP) compliant and Electrostatic deposition

The filters are all changed every day and disposed of according to hazardous material regulations.

APPLICABLE RULES/PERMIT CONDITIONS:

Permit 85-04B, Issued on February 9, 2010. Compliance with the permit conditions are evaluated below.

The following conditions apply to: EU-Coating Line 1

DESCRIPTION:
A miscellaneous metal parts coating line consisting of two primer booths, a primer oven, a topcoat booth, and a topcoat oven.

Flexible Group ID: FG-COATING LINES and FGFACILITY

POLLUTION CONTROL EQUIPMENT:
Dry filters within the paint spray booths.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Compliance Determination
1. VOCs	30.0 tpy	12-month rolling time period as determined at the end of each calendar month	EU-Coating Line 1	Compliance- Records are kept every month. VOCs are well below 30TPY
2. VOCs	3.5 lb/gal (minus water)* as	Daily volume-weighted average.	EU-Coating Line 1	Compliance- Records were reviewed and 3.5 lb/gal limit was met .

	applied			

* 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))

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste coatings, reducers, additives, catalysts, purge solvents, and cleanup solvents 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 336.1225, R 336.1702(a), R 336.1901)

Compliance- No open containers were observed.

2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. (R 336.1224, R 336.1370)

Compliance- Spent filters were placed in drum barrels and covered.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate any paint booth portion of EU-Coating Line 1 unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. (R 336.1224, R 336.1301, R 336.1901, R 336.1910)

Compliance- Filters were observed in booths and disposal logs were observed.

2. The permittee shall equip and maintain each paint booth portion of EU-Coating Line 1 with high volume low pressure (HVLP) applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. (R 336.1702(a))

Compliance- HVLP and Electrostatic guns were used.

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, reducer, additive, catalyst, purge solvent, and cleanup solvent, 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, R 336.1901, R 336.2001, R 336.2003, R 336.2004)

Compliance- MSDS were received in the past and no coatings have changed. As a military contractor, coatings are tested and certified by manufacturer. Based on emissions, a sample was not taken and analyzed at this time.

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 336.1225, R 336.1702, R 336.1901)
Compliance- Records are kept on a monthly basis.

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, additive, catalyst, purge solvent, and cleanup solvent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702, R 336.1901)

Compliance- MSDS are kept. Staff received copies.

3. The permittee shall keep the following information for EU-Coating Line 1:
   a) Gallons (with water) of each coating, reducer, additive, and catalyst used, on a daily basis
   b) VOC content (with water) of each coating, reducer, additive, and catalyst as applied, on a daily basis
   c) VOC emission calculations determining the volume-weighted average VOC content (minus water) of each coating as applied on a calendar day average basis.
   d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
   e) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

   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 336.1225, R 336.1702(d), R 336.1901)

Compliance- Records are kept.

4. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with EU-Coating Line 1:
   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 on file in a format acceptable to the AQD District Supervisor and make them available to the Department upon request. (R 336.1225, R 336.1702, R 336.1901)

Compliance- Records are kept.

VII. REPORTING

NA

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Compliance Determination
1. SVBLUSHWASH	34.0	51.0	Undetermined- Stack Height and Diameter were not measured but appeared to be accurate.
2. SVPRIME	34.0	51.0	Undetermined- Stack Height and Diameter were not

			measured but appeared to be accurate.
3. SVPRIMEOVEN	12.0	30.0	Undetermined- Stack Height and Diameter were not measured but appeared to be accurate.
4. SVTOPCOAT	34.0	51.0	Undetermined- Stack Height and Diameter were not measured but appeared to be accurate.
5. SVTOPOVEN	12.0	30.0	Undetermined- Stack Height and Diameter were not measured but appeared to be accurate.

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: EU-Coating Line 2

DESCRIPTION:
A miscellaneous metal parts coating line consisting of two primer booths, a primer oven, a topcoat booth, and a topcoat oven.

Flexible Group ID: FG-COATING LINES and FGFACILITY

POLLUTION CONTROL EQUIPMENT:
Dry filters within the paint spray booths.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Compliance Determination
1. VOCs	30.0 tpy	12-month rolling time period as determined at the end of each calendar month	EU-Coating Line 2	Compliance- Line 2 not operating
2. VOCs	3.5 lb/gal (minus water)* as applied	Daily volume-weighted average.	EU-Coating Line 2	Compliance- Line 2 not operating
* 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))				

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste coatings, reducers, additives, catalysts, purge solvents, and cleanup solvents 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 336.1225, R 336.1702(a), R 336.1901)

Compliance- No open containers were observed.

2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. (R 336.1224, R 336.1370)

Compliance- Filters were disposed in drum barrels with lids.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate any paint booth portion of EU-Coating Line 2 unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. (R 336.1224, R 336.1301, R 336.1901, R 336.1910)

Compliance- Line 2 was not operating.

2. The permittee shall equip and maintain each paint booth portion of EU-Coating Line 2 with high volume low pressure (HVLP) applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. (R 336.1702(a))

   Compliance- Line 2 was not operating.

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, reducer, additive, catalyst, purge solvent, and cleanup solvent, 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, R 336.1901, R 336.2001, R 336.2003, R 336.2004)

Compliance- Facility has MSDS on site. Also, being a military contractor, the coatings are tested and certified by manufacturer.

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 336.1225, R 336.1702, R 336.1901)

Compliance- Records are kept on a monthly basis.

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, additive, catalyst, purge solvent, and cleanup solvent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702, R 336.1901)

Compliance- MSDS are kept.

3. The permittee shall keep the following information for EU-Coating Line 2:
   a) Gallons (with water) of each coating, reducer, additive, and catalyst used, on a daily basis
   b) VOC content (with water) of each coating, reducer, additive, and catalyst as applied, on a daily basis
   c) VOC emission calculations determining the volume-weighted average VOC content (minus water) of each coating as applied on a calendar day average basis.
   d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
   e) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

   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 336.1225, R 336.1702(d), R 336.1901)

Compliance- Records are kept.

4. The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with EU-Coating Line 2:
   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 on file in a format acceptable to the AQD District Supervisor and make them available to the Department upon request. (R 336.1225, R 336.1702, R 336.1901)

Compliance- Records are kept.

VII. REPORTING

NA

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 Dimensions (inches)	Minimum Height Above Ground (feet)	Compliance Determination
1. SVBLUSHWASH2	30.0	51.0	Undetermined- Stack Height and Diameter were not measured but appeared to be accurate.
2. SVPRIME2	30.0	51.0	Undetermined- Stack Height and Diameter were not measured but appeared to be accurate.
3. SVPRIMEOVEN2	12.0	30.0	Undetermined- Stack Height and Diameter were not measured but appeared to be accurate.
4. SVTOPCOAT2	30.0	51.0	Undetermined- Stack Height and Diameter were not measured but appeared to be accurate.
5. SVTOPOVEN2	12.0	30.0	Undetermined- Stack Height and Diameter were not measured but appeared to be accurate.

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: FG-COATING LINES

DESCRIPTION:
Two miscellaneous metal parts coating lines. Each line consists of two primer booths, a primer oven, a topcoat booth, and a topcoat oven.

Emission Units: EU-Coating Line 1 and EU-Coating Line 2

POLLUTION CONTROL EQUIPMENT: Dry filters within the paint spray booths.

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Compliance Determination
L. Naphthalene CAS # 91-20-3)	876 Pounds*	12-month rolling time period as determined at the end of each calendar month	FG-COATING LINES	Compliance- Records reviewed indicate that no naphthalene containing coatings have been used since 2015. Notification has not been submitted, but AQD alerted facility staff that notification should be sent to remove this limit.

' The naphthalene limit shall be in effect through the end of the month in which the permittee gives the AQD District Supervisor written notification that the use of naphthalene-containing coatings will be discontinued.

II. MATERIAL LIMITS

1. The permittee may use a maximum of 55 gallons total of coatings, on a 12-month rolling basis, on FG-COATINGLINES, that will be excluded from the calculation of the daily volume-weighted average specified for EU-CoatingLine1 SC I.2 and EU-CoatingLine2 SC I.2. The mass emissions of VOCs from these coatings shall be counted toward the 30 ton per year limit specified for EU-CoatingLine1 and EU-CoatingLine2. (R 336.1702(d))

UNDETERMINED- The facility appears to be complying with the daily VOC limit weighted average. This condition originates from an older permit at a time when the facility used higher VOC content coatings, namely the Blue Wash Primer. This condition allowed the facility to exclude 55 gallons of higher VOC content coatings in the calculation of daily volume weighted average. However, a review of the records over the last couple of years, it appears that the facility is complying with the emission limit. AQD staff discussed possible permit revisions with the facility staff. AQD staff will revisit this at a future inspection.

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

1. Until the permittee gives the AQD District Supervisor written notification that the use of naphthalene-containing coatings has been discontinued, the permittee shall determine the Naphthalene (CAS # 91-20-3) content of any coating, reducer, additive, catalyst, purge solvent, and cleanup solvent, as applied and as received, from manufacturer's formulation data. Upon written notice from the AQD District Supervisor, the permittee shall determine the Naphthalene (CAS # 91-20-3) content using an approved test method. (R 336.1225, R 336.1901, R 336.2001, R 336.2003, R 336.2004)

Compliance- Records are kept. No naphthalene containing coating has been used since 2015.

VI. MONITORING/RECORDKEEPING

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

1. Until the permittee gives the AQD District Supervisor written notification that the use of naphthalene-containing coatings has been discontinued, 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 336.1225, R 336.1901)

Compliance- Records are kept.

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, additive, catalyst, purge solvent, and cleanup solvent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1901)

Compliance- Records are kept

3. Until the permittee gives the AQD District Supervisor written notice that the use of naphthalene-containing coatings has been discontinued, the permittee shall keep the following information on a monthly basis for

   FG-Coating Lines:

   a) Gallons of each coating, reducer, additive, and catalyst used.
   b) The Naphthalene (CAS # 91-20-3) content of each coating, reducer, additive, and catalyst as applied.
   c) Naphthalene (CAS # 91-20-3) mass emission calculations determining the monthly emission rate in pounds per calendar month.
   d) Naphthalene (CAS # 91-20-3) mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

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

Compliance- Records are kept, however, the facility discontinued the naphthalene containing coatings in 2015. Facility staff was advised that notice has not been submitted.

4. Until the permittee gives the AQD District Supervisor written notice that the use of naphthalene-containing coatings has been discontinued, the permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with FG-Coating Lines:

   a) Gallons of each solvent used and reclaimed.
   b) The Naphthalene (CAS # 91-20-3) content, in pounds per gallon, of each solvent used.
   c) Naphthalene (CAS # 91-20-3) mass emission calculations determining the monthly emission rate in pounds per calendar month.
   d) Naphthalene (CAS # 91-20-3) 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 on file in a format acceptable to the AQD District Supervisor and make them available to the Department upon request. (R 336.1225, R 336.1901)

Compliance- Records are kept.

5. The permittee shall record, on a daily basis, the number of gallons of coatings used in FG-COATINGLINES that are excluded from the calculation of the daily volume-weighted average specified for EU-CoatingLine1

   SC I.2 and EU-CoatingLine2 SC I.2, on a 12-month rolling basis. Records shall be kept in a format acceptable to the AQD District Supervisor and made available to the Department upon request. (R 336.1702(d))

Compliance- Records are kept.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Footnotes:

[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT:

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Compliance Determination
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	Compliance- Single individual HAPs are less than 9TPY.
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	Compliance- Aggregate HAPS are less than 22.5.
3. VOCs	Less than 89.9 tpy	365-day rolling time period as determined at the end of each calendar day	FGFACILITY	Compliance- VOC emissions are less than 89.9 TPY

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

1. 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))

Compliance- Records are kept as are MSDS. The amount of emissions at this time does not warrant verification. However, because the facility is a military contractor, there is certification by the manufacturer.

2. 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 336.1205(3))

Compliance- MSDS are at the facility. Also, because the facility is a military contractor, there is certification by the manufacturer.

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))

Compliance- Records are kept.

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 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(3))

Compliance- Records are kept.

3. The permittee shall keep the following information on a daily 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 annual emission rate in tons per 365-day rolling time period as determined at the end of each 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(3))

Compliance- Records are kept.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS:
N/A

MAERS REPORT REVIEW:

Pollutant	2018 Emissions(TPY)
CO	
NOx	
PM	
Sox	
VOC	4.1

FINAL COMPLIANCE DETERMINATION:

The facility appears that they are in compliance with the applicable requirements. There is question about Condition FGCOATINGLINES II.1-, specifically with the 55 gallon exclusion. This limit is a carryover from an older version of the current Permit to Install. Historically, the facility had coatings that were higher in VOC content than what is now in practice. It appears by reviewing the records that the facility is still able to comply with the 3.5 lb/gallon even with excluded(as labeled) coatings included in the daily calculation. AQD staff did discuss possible options with the facility staff, including a permit revision. AQD staff will revisit this condition in future inspections.

NAME _____ DATE 12-20-19 SUPERVISOR W.M.