

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

P097251034

FACILITY: Aristeo Installation, LLC		SRN / ID: P0972
LOCATION: 11341 West Vienna Road, MONTROSE		DISTRICT: Lansing
CITY: MONTROSE		COUNTY: GENESEE
CONTACT: Matthew Galsterer , Purchasing Administrator		ACTIVITY DATE: 10/17/2019
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection of recently permitted facility.		
RESOLVED COMPLAINTS:		

On 10/17/2019, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of Aristeo Installation, LLC (Aristeo).

Facility environmental contacts:

Craig Bishop, Operations Manager; cbishop@aristeo.com

Matthew Galsterer, Purchasing Administrator, mgalsterer@aristeo.com

Facility description:

This facility is in the business of metal fabrication. They cut and weld metal to assemble their products, and then prime and paint them in coating booths onsite.

Emission unit summary table:

Emission Unit* ID	Emission Unit Description	Permit to Install (PTI) No. or exemption rule	Flexible Group ID	Compliance Status
EUPAINTAREA1	Existing 2,500 square foot painting area, with a filtered air exhaust system, used to coat fabricated and structural steel.	PTI No. 161-18	FGCOATING	Compliance
EUPAINTAREA2	Existing 2,500 square foot painting area, with a filtered air exhaust system, used to coat fabricated and structural steel.	PTI No. 161-18	FGCOATING	Compliance
EUPAINTAREA3	Existing 3,000 square foot painting area, with a filtered air exhaust system, used to coat fabricated and structural steel.	PTI No. 161-18	FGCOATING	Compliance
Metal working equipment	Metal working processes	Rule 285(2)(I)(vi) (B)	NA	Compliance
Welders	Welding processes	Rule 285(2)(i)	NA	Compliance

*An *emission unit* is any part of a stationary source which emits or has the potential to emit an air contaminant.

Flexible Group Summary Table:

Flexible Group** ID	Flexible Group Description	Associated Emission Unit IDs	Compliance status
FGCOATING	Three coating areas	EUPAINTAREA1, EUPAINTAREA2, EUPAINT AREA3	Compliance
FGMETALPARTS	All metal parts coating lines source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment		Compliance
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment		Compliance

**A *flexible group* is used in a permit to install (PTI) or Renewable Operating Permit (ROP) to combine two or more emission units that have common or identical requirements.

Regulatory overview:

This facility has an opt-out permit, Permit to Install (PTI) No. 161-18, which contains limits to restrict the facility's PTE for hazardous air pollutants (HAPs), to prevent it from being a *major HAPs source*. A facility is major for HAPs if it has PTE of 10 tons per year (TPY) or more for a single HAP, or 25 TPY or more for aggregate HAPs. Aristeo agreed to limits for individual HAPs and total HAPs in their permit to install, to ensure that they operate as a minor, or *area source*, of HAP emissions. Major sources of HAPs are required to obtain a Renewable Operating Permit (ROP).

PTI No. 161-18 also sets synthetic minor limits for volatile organic compounds (VOCs), to keep it from becoming major, even though it did not have the PTE to be major for VOCs at this time. VOCs are one of the *criteria pollutants*, that is, pollutants for which National Ambient Air Quality Standards are set by the U.S. Environmental Protection Agency. The other criteria pollutants include carbon monoxide, nitrogen oxides, sulfur dioxide, lead, particulate matter smaller than 10 microns (PM-10) and particulate matter smaller than 2.5 microns (PM2.5). A major source of criteria pollutants has the PTE to emit 100 TPY or more of one or more of those pollutants. Major sources of criteria pollutants are required to obtain a ROP.

Aristeo has some metal working and welding processes which are classified as exempt from the requirement of EGLE Michigan Air Pollution Control (MAPC) Rule 201 to obtain a permit to install. This is because they satisfy the exemption criteria. Please see the Emission Unit Summary Table, above, for the specific exemptions.

There is no boiler at this site. It is typical for industrial facilities to have hot water heaters onsite for restrooms, however. To meet the definition of a hot water heater under 40 CFR Part 63, Subpart JJJJJJ, *National Emissions Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers Area Sources*, the unit must be no more than 120 gallons in capacity. It is my understanding that Aristeo has two electric hot water heaters on site, each one being less than 120 gallons in capacity. Because they are each less than 120 gallons in size, they are not subject, under Section 63.11195(f). However, they are also not subject because the rule only applies to fossil-fuel fired hot water heaters.

Aristeo has determined that they are not subject to 40 CFR Part 63, Subpart XXXXXX, *National Emissions Standards for Hazardous Air Pollutants (NESHAP): Area Source Standards for Nine Metal Fabricating and Finishing Source Categories*, also known as 6X. This federal rule applies only to HAP area sources (e.g., minor sources of HAPs) which are primarily in one of 9 source categories. These 9 source categories are identified with 15 North American Industrial Classification System (NAICS) Codes, so the company can determine their applicability based on their facility's NAICS Code. Additionally, even if a source is within one of the 9 source categories, they are only subject to the rule if they use coatings containing specific HAP metals: compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form, with the exception of lead. Aristeo determined that their coatings did not contain these heavy metals.

It is my understanding that Aristeo has no cold cleaners or vapor degreasers, nor do they have any non-solvent-

based parts washers, because their steel arrives at the facility clean. I have been told that they may occasionally wipe metal down. They therefore do not appear to be subject to the Michigan Air Pollution Control Rules which pertain to existing or new cold cleaners or vapor degreasers.

Fee status:

This facility is considered a Category E fee-subject facility, because it has an opt-out permit, to restrict its potential to emit from making it a major source. It does not fall under other fee categories, because it is not a major source of criteria air pollutants, nor a major source for HAPs. Additionally, it is neither subject to a federal New Source Performance Standard regulation, nor a federal Maximum Achievable Control Technology standard.

Now that the facility has an opt-out air permit, they are required to submit an annual emissions report to the Michigan Air Emission Reporting System (MAERS).

Location:

The facility is located along M-57 or Vienna Road, a short distance west of downtown Montrose, where M-57 is also known as State Street. The nearest residence is to the north, directly across the street. There is an auto refinishing business immediately east of Aristeo. The nearest residence to the east is about 330 feet from the Aristeo plant buildings, as measured by me in Google Maps. The nearest residence to the west is about 525 feet west of the plant. A commercial greenhouse is about 1,000 feet west northwest of the plant. An auto repair shop is about 400 feet to the northeast of the plant. There is a gas station about 1,700 feet to the east. To the north and south of the residential areas are wooded areas, for over half a mile.

History:

It is AQD's understanding that Aristeo purchased this facility in late 2014, and that coating operations began here in early 2015. There has been a series of complaints alleged against Aristeo beginning in 2018 through the present, with the primary complainant residing upwind. The complainant has reported experiencing odors and physical symptoms of illness when detecting odorous emissions, and sometimes when driving at a distance of up to several or more miles from Aristeo, as of the date of this inspection. Subsequently they have reported detecting odors up to 14 miles away.

AQD has not been able to confirm the presence of odors from Aristeo further away than the complainant's residence, where staff briefly experienced a barely detectable paint or solvent odor, on one occasion in 2018. On other occasions, paint or solvent odors have been detected along M-57, adjacent to or immediately downwind of Aristeo. These odors were determined to be insufficient at those times to constitute a violation of EGLE MAPC Rule 901(b), which prohibits unreasonable interference with the comfortable enjoyment of life and property.

Complaints of suspected fallout have also been received, from the primary complainant. Suspected fallout samples which the complainant provided did not meet AQD's chain of custody requirements, and therefore they were not analyzed. Subsequently, AQD collected suspected fallout samples from the complainant's window on 7/24/2018, so as to satisfy chain of custody requirements. Also that day, samples of coatings which Aristeo was using were collected by AQD. The samples were sent to a contract lab, which utilized microscopy to examine them. The lab's report stated that the suspected fallout samples did not contain paint deposits.

AQD has found only one instance of noncompliance; that the facility had, on rare occasions in 2017 and 2018, exceeded the 200 gallons per month exemption threshold for a coating line allowed by MAPC Rule 287. A Violation Notice (VN), for not having a permit to install as required by MAPC Rule 201, was sent to the company on 7/10/2018. The company was informed that an acceptable program for compliance could include an air permit application.

The company applied for a Permit to Install application in August, 2018. On 1/15/2019, Opt-Out PTI No. 161-18 was approved. This permit contains restrictions to limit the facility's potential to emit (PTE) of HAPs, so that it remains an area source for HAPs, rather than a major source. The permit also contains restrictions for VOC emissions.

On 12/6/2018, AQD staff deployed a summa canister on the Aristeo site, near the east property line, downwind of the southernmost of the two shop buildings onsite. Paint odors were detected from Aristeo at that time, in the vicinity of the summa canister. The facility appeared to be operating normally that day. AQD returned to the site on 12/7/2018, and closed the valve to the summa canister, 24:00 hours after the sample collection had started. AQD followed the sample collection procedures in the *SOP for VOC Fixed Orifice Sampling*.

The summa canister was mailed to a contracted environmental laboratory by AQD's Lansing District, on 12/10/2018.

On 4/11/2019, the sample results were received by AQD. The AQD Toxics Unit began a review of the sampling results, which was ongoing, as of the date of the 10/17/2019 inspection. The subsequent results of their review were later forwarded to the primary complainant, and to the company.

Safety apparel required:

Site safety requirements for the site are not known to me, but I would recommend safety glasses with side shields, and steel-toed work boots.

Odor evaluation:

Prior to arrival at the facility, AQD conducted an odor evaluation in the area surrounding the facility, including the area where the primary complainant resides. Please see attached odor evaluation form, map of offsite odors detected, and 24-hour summary of weather data. Weather conditions at this time were cloudy and 52 degrees F, with winds out of the west northwest at 10 miles per hour.

At 1:03 PM, on M-57, immediately north of Aristeo, there was a barely detectable odor which was sweet, and smelled like fruit. I did not realize it at the time, but there is reportedly a fruit orchard north of M-57. The odor which I had detected was determined to be insufficient to constitute unreasonable interference with the comfortable enjoyment of life and property. AQD will continue to check for the presence of odors, when in the vicinity of Montrose.

Arrival:

I arrived at 1:09 PM. I noted that the overhead truck doors on the two Aristeo shop buildings were closed. One of the requirements of PTI No. 161-18 is that the overhead doors be closed during any painting operations, and for the next half hour. They appeared to be complying with this requirement. I did not detect any odors in the parking lot by the office, with the wind out of the west northwest.

Per AQD requirements, I had my identification/credentials available. I met with Mr. Craig Bishop, Operations Manager, and with Mr. Matt Galsterer, Purchasing Administrator. I explained the reason for this visit, that AQD inspectors are to inspect newly permitted facilities within several months of the issuance of the air permit. Additionally, AQD inspects opt-out sources no less than once every 4 years.

Pre-inspection meeting:

Mr. Galsterer was my main contact for this inspection. I informed him of the odor evaluation I had done, immediately before my arrival, and of the fruit-like odor which I detected along M-57. He advised me of the presence of a fruit orchard north of M-57. Winds had been out of the west northwest, potentially putting me downwind of the orchard. We also discussed the permit and recordkeeping.

Mr. Galsterer showed me their VOC and HAP recordkeeping, which were done using a spreadsheet that had been developed by the Environmental Assistance Division of the Michigan Department of Environmental Quality (now EGLE), for use by industry. He subsequently emailed records to me on 10/21/2019, which are attached to this report. For a review of the data, please see the compliance check of the air permit's special conditions, which are discussed one by one, later in this activity report.

Inspection:

Mr. Galsterer and I walked through the north and south plant buildings. I saw no visible emissions from metal working equipment, nor from any welding units. These processes are considered exempt from needing a PTI.

I was shown their paint room, which is in a concrete block building, outside of the metal shop buildings. I found no uncovered containers of paints or other raw materials.

The overhead truck doors for the north and south plant buildings were closed. AQD required in the permit that these doors be closed during painting operations and for half an hour afterwards. This was done to avoid fugitive emissions of VOCs and paint spray particulates being released to the outside air at ground level.

EUPAINTAREA1 is in the north shop building. The bank of mat/panel filters on the back interior wall looked to be properly installed, and in good condition. The pressure drop on the pressure drop gauge was 0.6 inches, water column (w.c.). From outside the shop building, it could be seen that the #1 stack had no visible emissions, and the

stack showed no discoloration from paint droplets.

EUPAINTAREA2 is also in the north shop building. The bank of mat/panel filters looked to be properly installed, and in very good condition. The pressure drop was also 0.6 inches, w.c. From outside the shop building, it could be seen that the #2 stack had no visible emissions, and showed no discoloration from paint droplets.

EUPAINTAREA3 is in the south shop building. This paint area can be divided into two smaller areas, or operated as a single large paint area. A curtain presently subdivided it into the two smaller areas, each with its own bank of mat/panel filters, and its own exhaust stack. The filters for the first small area looked almost new. White paint had recently been applied to large metal parts on the floor. Pressure drop was 0.52-0.54 inches, w.c. This filter bank was served by stack #3, which had no visible emissions, nor any sign of discoloration from paint droplets.

Painting was taking place in the second smaller paint area, at this time. There was a distinct and definite odor of paint, but it was not excessively strong. The bank of mat/panel filters was in good shape, and the pressure drop was 0.52-0.53 inches, w.c. Stack #4 served this filter bank. Outside, I could see neither visible emissions from the exhaust stack, nor any discoloration of the stack from paint droplets.

I was shown that they are using paint recordkeeping forms for each paint area, to track daily coating use. As an example, on 10/1/2019, only 5.0 gallons of coatings total were used plantwide, and that was in EUPAINTAREA2.

No violations were identified during the walk-through portion of the inspection. I was sent copies of the plant recordkeeping by email. With those records, I reviewed the facility's compliance with the special conditions of their opt-out permit, below:

Compliance with the opt-out PTI No. 161-18

FGCOATING:

DESCRIPTION: Three coating areas.

Emission Units: EUPAINTAREA1, EUPAINTAREA, EUPAINTAREA3

POLLUTION CONTROL EQUIPMENT: Particulate filter exhaust system for each paint area

FGCOATING I. EMISSION LIMITS

Special Condition (SC) FGCOATING I. EMISSION LIMITS 1. This limits VOC emissions from each of the three coating areas, including all associated purge and clean-up operations, to no more than 2,000 lbs/month, on a calendar month basis.

INSPECTION RESULT: COMPLIANCE. A review of Aristeo's records for 2019 (please see attached) showed that for each of the three paint areas, VOC emissions were below the 2,000 lb limit, and therefore, in compliance.

Emission Unit	Month and year	VOC emissions, in lbs	Permit limit, in lbs	Compliance?
EUPAINTAREA1	Jan. 2019	180	2,000	Yes
EUPAINTAREA1	Feb. 2019	242	2,000	Yes
EUPAINTAREA1	March 2019	262	2,000	Yes
EUPAINTAREA1	April 2019	145	2,000	Yes
EUPAINTAREA1	May 2019	319	2,000	Yes
EUPAINTAREA1	June 2019	92	2,000	Yes
EUPAINTAREA1	July 2019	444	2,000	Yes
EUPAINTAREA1	Aug. 2019	756	2,000	Yes
EUPAINTAREA1	Sept. 2019	543	2,000	Yes
EUPAINTAREA1	October 1-17, 2019	583	2,000	Yes
EUPAINTAREA2	Jan. 2019	1,338	2,000	Yes
EUPAINTAREA2	Feb. 2019	520	2,000	Yes
EUPAINTAREA2	March 2019	695	2,000	Yes

EUPAINTAREA2	April 2019	392	2,000	Yes
EUPAINTAREA2	May 2019	777	2,000	Yes
EUPAINTAREA2	June 2019	281	2,000	Yes
EUPAINTAREA2	July 2019	616	2,000	Yes
EUPAINTAREA2	Aug. 2019	880	2,000	Yes
EUPAINTAREA2	Sept. 2019	417	2,000	Yes
EUPAINTAREA2	October 1-17, 2019	538	2,000	Yes
EUPAINTAREA3	Jan. 2019	400	2,000	Yes
EUPAINTAREA3	Feb. 2019	481	2,000	Yes
EUPAINTAREA3	March 2019	1,235	2,000	Yes
EUPAINTAREA3	April 2019	461	2,000	Yes
EUPAINTAREA3	May 2019	729	2,000	Yes
EUPAINTAREA3	June 2019	449	2,000	Yes
EUPAINTAREA3	July 2019	374	2,000	Yes
EUPAINTAREA3	Aug. 2019	503	2,000	Yes
EUPAINTAREA3	Sept. 2019	456	2,000	Yes
EUPAINTAREA3	October 1-17, 2019	491	2,000	Yes

SC FGCOATING I. EMISSION LIMITS 2. This limits emissions of VOC, tert-butyl acetate, and p-chlorobenzotrifluoride combined from each individual coating area to 10 TPY, on a 12-month rolling basis.

INSPECTION RESULT: COMPLIANCE. The spreadsheets (attached) which were emailed to AQD on 3/7/2020 in support of Aristeo's MAERS submittal for the 2019 operating year include 12-month rolling values for VOCs, total HAPs, and some individual HAPs, but not tert-butyl acetate, or p-chlorobenzotrifluoride. It is my understanding, from discussion with the company, that this equates with zero use and therefore zero emissions of these compounds. The reported 12-month VOC emissions for all 3 coating areas combined were 9.63 tons, as of December. Even if the 9.63 tons was all from a single coating area, it would be below the 10 TPY limit for each coating line. AQD has also received the 2019 12-month rolling VOC emissions broken out for each coating area.

Note: The year in the spreadsheet was listed as 2007, and I contacted the company about this. It apparently is a digital sort of artifact that dates back to the creation of the spreadsheet by what was then the Environmental Assistance Division of DEQ.

SC FGCOATING I. EMISSION LIMITS 3. This limits Methyl isobutyl ketone (MIBK) emissions to no more than 50 lbs/day for the entire flexible group, FGCOATING, as opposed to each individual coating area.

INSPECTION RESULT: COMPLIANCE. Aristeo in 2019 reported using two raw materials which contained MIBK. The two raw materials were different types of primer. Please see the tables below for comparison of MIBK emissions with the MIBK monthly limit. The first table shows daily KEM FLASH 500 Primer, White usage and emissions of MIBK emissions, while the second table shows daily Steel Spec Universal Primer, White usage and emissions of MIBK. The third table shows daily emissions of MIBK from both types of primer. At no time did reported MIBK emissions exceed the 50 lbs/day limit.

Table for usage of KEM FLASH 500 Primer, White, with MIBK emissions of 2.14 lbs/gal:

Date coating used in 2019	Paint Area 1: gal KEM FLASH 500 Primer, White	Paint Area 2: gal KEM FLASH 500 Primer, White	Paint Area 3 gal KEM FLASH 500 Primer, White	Paint Area 1 lbs MIBK emitted from KEM FLASH 500 Primer, White	Paint Area 2 lbs MIBK emitted from KEM FLASH 500 Primer, White	Paint Area 3 lbs MIBK emitted from KEM FLASH 500 Primer, White	FGCOATING total daily lbs MIBK emitted from KEM FLASH 500 Primer, White
1/3	NA	1.5	NA	NA	3.21	NA	3.21
1/10	2.5	7.0	NA	5.35	14.98	NA	20.33
1/11	1.5	NA	NA	3.21	NA	NA	3.21
1/24	NA	1.0	NA	NA	2.14	NA	2.14
3/4	NA	NA	0.5	NA	NA	1.07	1.07

3/6	6.0	NA	NA	12.84	NA	NA	12.84
3/18	NA	NA	13	NA	NA	27.82	27.82
3/20	3.0	1.0	NA	6.42	2.14	NA	8.56
3/27	7.0	NA	NA	14.98	NA	NA	14.98

Table for Steel Spec Universal Primer, White, with MIBK emissions of 0.87 lbs/gal used

Date coating used in 2019	Paint Area 1: gal Steel Spec Universal Primer, White	Paint Area 2: gal Steel Spec Universal Primer, White	Paint Area 3 gal Steel Spec Universal Primer, White	Paint Area 1 lbs MIBK emitted from Steel Spec Universal Primer, White	Paint Area 2 lbs MIBK emitted from Steel Spec Universal Primer, White	Paint Area 3 lbs MIBK emitted from Steel Spec Universal Primer, White	FGCOATING total daily lbs MIBK emitted from Steel Spec Universal Primer, White
1/8	NA	NA	1.25	NA	NA	1.09	1.09
1/15	NA	NA	5.5	NA	NA	4.79	4.79
1/16	3.0	NA	8.5	2.61	NA	7.40	10.01
1/18	NA	NA	0.5	NA	NA	0.44	0.44
1/21	2.5	4.5	1.5	2.18	3.92	1.31	7.41
1/22	3.0	6.0	2.0	2.61	5.22	1.74	9.57
1/23	4.0	NA	7.0	3.48	NA	6.09	9.57
1/24	NA	0.5	NA	NA	0.44	NA	0.44
1/25	NA	1.0	NA	NA	0.87	NA	0.87
1/28	0.5	9.5	5.0	0.44	8.27	4.35	12.62
1/29	NA	5.0	4.5	NA	4.35	3.92	8.27
1/30	NA	0.5	2.5	NA	0.44	2.18	2.62
1/31	0.5	NA	NA	0.44	NA	NA	0.44
3/5	1.0	NA	NA	0.87	NA	NA	0.87
3/7	11.0	NA	NA	9.57	NA	NA	9.57
3/11	NA	NA	3.5	NA	NA	3.05	3.05
3/27	NA	1.5	NA	NA	1.31	NA	1.31

Combined MIBK emissions on a daily basis, from use of KEM FLASH 500 Primer White, and Steel Spec Universal Primer, White, in 2019

Date in 2019	Lbs MIBK emitted from KEM FLASH 500 Primer, White	Lbs MIBK emitted from Steel Spec Universal Primer, White	Total lbs/day MIBK emitted	Over 50 lbs/day MIBK emission limit?
1/3	3.21	0	3.21	No
1/8	0	1.09	1.09	No
1/10	20.33	0	20.33	No
1/11	3.21	0	3.21	No
1/15	0	4.79	4.79	No
1/16	0	10.01	10.01	No
1/18	0	0.44	0.44	No
1/21	0	7.41	7.41	No
1/22	0	9.57	9.57	No
1/23	0	9.57	9.57	No
1/24	2.14	0.44	2.58	No
1/25	0	0.87	0.87	No
1/28	0	12.62	12.62	No
1/29	0	8.27	8.27	No
1/30	0	2.62	2.62	No
1/31	0	0.44	0.44	No
3/4	1.07	0	1.07	No
3/5	0	0.87	0.87	No
3/6	12.84	0	12.84	No
3/7	0	9.57	9.57	No
3/11	0	3.05	3.05	No
3/18	27.82	0	27.82	No

3/20	8.56	0	8.56	No
3/27	14.98	1.31	16.29	No

Note: Mr. Galsterer verbally informed me that, based upon mentally doing calculations, he believed they might have exceeded the 50lbs/day MIBK emission limit by 1 to 3 lbs, on two or three occasions in January and March of 2019, when they were using two primers containing MIBK. Subsequently, however, my tabulation of the data, in the tables above, showed that they did not actually exceed 50 lbs/day. The highest daily total for MIBK emissions was 28 lbs/day, barely more than half the limit. The company no longer uses these two primers, which were for specific contracts, that they have completed.

FGCOATING II. MATERIAL LIMITS

Nonapplicable (NA).

FGCOATING III. PROCESS/OPERATIONAL RESTRICTION

SC FGCOATING III. PROCESS/OPERATIONAL RESTRICTIONS 1. This requires the facility to capture all purge/clean-up solvents and waste coatings and store them in closed containers, and to dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.

INSPECTION RESULT: COMPLIANCE. I saw no open containers of clean-up solvents or waste coatings. It is my understanding that all liquid paint and solvent waste is removed as hazardous waste, by Safety Klean.

SC FGCOATING III. PROCESS/OPERATIONAL RESTRICTIONS 2. This requires the facility to dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.

INSPECTION RESULT: COMPLIANCE. I have been informed that their used particulate filters are removed as solid waste, utilizing a dumpster.

SC FGCOATING III. PROCESS/OPERATIONAL RESTRICTIONS This requires the facility to handle all VOC and/or HAP containing materials, including coatings, reducers, solvents, and thinners in a manner to minimize the generation of fugitive emissions. They are required to keep containers covered at all time except when operator access is necessary.

INSPECTION RESULT: COMPLIANCE. I was shown their paint room, which is in a concrete block building, outside of the metal shop buildings. I found no uncovered containers of paints or other raw materials.

SC FGCOATING III. PROCESS/OPERATIONAL RESTRICTIONS 4. This requires the facility to keep the overhead doors located adjacent to the coating areas closed during all painting operations and for a half hour after painting operations are complete, to minimize the generation of fugitive emissions.

INSPECTION RESULT: COMPLIANCE. At the time of my arrival, and during the inspection, the overhead truck doors were closed. This complies with the permit, as EUPAINTAREA3 was applying coatings during the inspection. AQD put this requirement into the permit to avoid fugitive emissions of VOCs or paint spray particulates being released to the outside air at ground level.

FGCOATING IV. DESIGN/EQUIPMENT PARAMETERS

SC FGCOATING IV. DESIGN/EQUIPMENT PARAMETERS 1. This states that the facility shall not operate any coating area in FGCOATING unless its particulate filter exhaust system is installed, maintained, and operated in a satisfactory manner.

INSPECTION RESULT: COMPLIANCE. During the inspection, we observed the three paint areas. They are discussed in more detail, earlier in this report. Their status is summarized below:

1. *EUPAINTAREA1:* This is in the north shop building. The particulate filter exhaust system was installed, maintained, and operated in a satisfactory manner. There were no visible emissions.
2. *EUPAINTAREA2:* This is also in the north shop building. The particulate filter exhaust system was installed, maintained, and operated in a satisfactory manner. There were no visible emissions.
3. *EUPAINTAREA3:* This is in the south shop building. This paint area can be divided into two smaller areas, or operated as a single large paint area. A curtain presently divided it into the two smaller areas, each with its own bank of mat/panel filters, and its own exhaust stack. The particulate filter exhaust systems were installed, maintained, and operated in a satisfactory manner. There were no visible emissions.

SC FGCOATING IV. DESIGN/EQUIPMENT PARAMETERS 2. This requires the facility to equip and maintain FGCOATING with either high volume-low pressure (HVLP) spray applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, if any, the facility is required to keep test caps available for pressure testing.

INSPECTION RESULT: COMPLIANCE. I was shown that the facility is using airless, air-assisted spray guns, which are considered comparable to or better than HVLP spray guns, for transfer efficiency. Test caps for pressure testing are neither applicable nor required for airless, air-assisted spray guns.

FGCOATINGS V. TESTING/SAMPLING

This requires records to be maintained on file for a period of five years.

SC FGCOATINGS V. TESTING/SAMPLING 1. This requires that the permittee determine the VOC content, water content and density of any coating, 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.

INSPECTION RESULT: COMPLIANCE. In a 7/16/2019 email, Aristeo requested approval from AQD to use manufacturer's formulation data in lieu of Method 24. In an 8/14/2019 letter, AQD approved the request. The facility is keeping Safety Data Sheets (SDS), formerly known as Material Safety Data Sheets, in addition to Environmental Data Sheets (EDS). These were provided to AQD, during the permit application process, and are in the district and central office permit files.

FGCOATINGS VI. MONITORING/RECORDKEEPING

SC FGCOATINGS VI. MONITORING/RECORDKEEPING 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.

INSPECTION RESULT: COMPLIANCE. The spreadsheets which Aristeo emailed to AQD on 10/21/2019, 3/7/2020, and 5/4/2020 contained required calculations in an acceptable format. It is AQD's understanding, from discussion with the company, that the coating material usage data is received by the office on log sheets near the end of the work day, and entered by their office administrator into the electronic spreadsheet the following morning.

SC FGCOATINGS VI. MONITORING/RECORDKEEPING 2. 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 and make them available to the Department upon request.

INSPECTION RESULT: COMPLIANCE. The company submitted numerous Safety Data Sheets (SDS) and Environmental Data Sheets (EDS), during the permit application process. On 7/24/2019, several months after approval of their PTI, they submitted SDS and EDS to AQD, to inform AQD of a new, less toxic primer they would like to use. This new coating was identified as Kem-Flash 500 HAPs Primer, a less toxic version of their current Kem-Flash 500 primer. Note: The switch to this lower HAP version of the same manufacturer's primer may fit an exemption from needing a permit under Michigan Air Pollution Control Rule 285(2)(b)(i)(A), which exempts the following:

(b) Changes in a process or process equipment which do not involve installing, constructing, or reconstructing an emission unit and which do not involve any meaningful change in the quality and nature or any meaningful increase in the quantity of the emission of an air contaminant therefrom.

(i) Examples of such changes in a process or process equipment include, but are not limited to, the following:

(A) Change in the supplier or formulation of similar raw materials, fuels, or paints and other coatings.

On 7/25/2019, I emailed the above exemption language to Mr. Galsterer. On 1/30/2020, while this report was being written, I emailed to Mr. Galsterer a notification of an upcoming EGLE AQD training webinar on Meaningful Change and Policy and Procedure AQD-025. This webinar will be held in May, 2020, and is intended to assist industries as well as regulators in determining what does or does not use an air permit.

SC FGCOATINGS VI. MONITORING/RECORDKEEPING 3. The permittee shall keep the following information, for each coating area separately, on a monthly basis for FGCOATING:

a) Gallons (with water) of each material used.

INSPECTION RESULT: COMPLIANCE. The attached spreadsheets emailed by Mr. Galsterer on 10/21/2019 show both the daily and monthly usage in gallons (with water) of each material used. This complies with the above condition.

b) Where applicable, gallons (with water) of material reclaimed.

INSPECTION RESULT: NOT APPLICABLE. The spreadsheets emailed to AQD on 10/21/2019 showed no materials as being reclaimed. The spreadsheets (attached) which were emailed in March 2020 in support of Aristeo's MAERS submittal for the 2019 operating year also showed no material being reclaimed.

c) VOC content (with water), acetone content, tert-butyl acetate content and p-chlorobenzotrifluoride content in pounds per gallon, of each material as applied.

INSPECTION RESULT: COMPLIANCE. The spreadsheets (attached) which were emailed to AQD on 3/7/2020 in support of Aristeo's MAERS submittal for the 2019 operating year include VOC content of the coatings themselves, and content of specific HAPs but not acetone, tert-butyl acetate, or p-chlorobenzotrifluoride content. It is my understanding, from a 5/4/2020 telephone call with the company, that this means the company has not used coating materials containing these

compounds.

d) VOC, acetone, tert-butyl acetate and p-chlorobenzotrifluoride mass emission calculations determining the monthly emission rate in tons per calendar month.

INSPECTION RESULT: COMPLIANCE. VOC mass emission calculations were provided for each coating area in lbs, in the paint area monthly spreadsheets which AQD was sent on 10/21/2019. The spreadsheets (attached) which were emailed to AQD on 3/7/2020 and 5/4/2020 include monthly emissions for VOCs, total HAPs, and some individual HAPs, but not acetone, tert-butyl acetate, or p-chlorobenzotrifluoride. It is my understanding, from discussion with the company, that this represents zero use and zero emissions of these compounds.

e) VOC, acetone, tert-butyl acetate and p-chlorobenzotrifluoride combined 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.

INSPECTION RESULT: COMPLIANCE. The spreadsheets (attached) which were emailed to AQD on 3/7/2020 and 5/4/2020 include 12-month rolling values for VOCs, total HAPs, and some individual HAPs, but not acetone, tert-butyl acetate, or p-chlorobenzotrifluoride. It is my understanding, from discussion with the company, that this represents zero use and zero emissions of these compounds.

The permittee shall keep the records using mass balance or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.

INSPECTION RESULT: COMPLIANCE. These records have been kept, using mass balance, and have been kept on file both electronically and in hard copy form, AQD has been advised. Also, they have been made available upon request.

SC FGCOATINGS VI. MONITORING/RECORDKEEPING 4. The permittee shall keep the following information on a calendar day basis for FGCOATING:

a) Gallons (with water) of each methyl isobutyl ketone (MIBK) containing material used.

INSPECTION RESULT: COMPLIANCE. The spreadsheets for the 3 paint areas sent to AQD on 10/21/2019 (attached) show gallons of MIBK containing material used each day. MIBK was not used every day, nor every month. For only those months in which it was actually used, MIBK has a dedicated column in the spreadsheets.

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

INSPECTION RESULT: NOT APPLICABLE. The Aristeo spreadsheets do not indicate that any MIBK has been reclaimed.

c) MIBK content in pounds per gallon, of each material as applied.

INSPECTION RESULT: COMPLIANCE. The Aristeo spreadsheets sent to AQD on 3/7/2020 in support of the MAERS submittal for the 2019 operating year identify the amount of MIBK in each material. Aristeo classifies the coatings as "paint-combined" in this spreadsheet. It is my understanding that this equates to "as applied."

d) MIBK mass emission calculations determining the daily emission rate in pounds per calendar day.

INSPECTION RESULT: COMPLIANCE. The spreadsheets for the 3 paint areas which were emailed to AQD on 10/21/2019 identify the lbs of MIBK emitted per day, for each calendar month this far in 2019. Some months did not have any emissions at all of MIBK, and no column for MIBK appears during those months.

The permittee shall keep the records using mass balance or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.

INSPECTION RESULT: COMPLIANCE. The company is keeping these records using mass balance. They were made available to the Department upon request. AQD will contact Aristeo regarding interpretation of the phrase "paint-combined".

**FGCOATINGS VII. REPORTING
NA**

FGCOATINGS VIII. STACK/VENT RESTRICTIONS

SC FGCOATINGS VIII. STACK/VENT RESTRICTIONS 1. This limits the dimensions of stack #1 to a maximum exhaust diameter of 22 inches and minimum height of 26.5 feet.

INSPECTION RESULT: COMPLIANCE. Stack #1 appeared to be in accordance with these dimensions, as best as I could determine with the unaided eye.

SC FGCOATINGS VIII. STACK/VENT RESTRICTIONS 2. This limits the dimensions of stack #2 to a maximum exhaust diameter of 22 inches and minimum height of 26.5 feet.

INSPECTION RESULT: COMPLIANCE. Stack #2 appeared to be in accordance with these dimensions, as best as I could determine with the unaided eye.

SC FGCOATINGS VIII. STACK/VENT RESTRICTIONS 3. This limits the dimensions of stack #3 to a maximum exhaust diameter of 22 inches and minimum height of 29 feet.

INSPECTION RESULT: COMPLIANCE. Stack #3 appeared to be in accordance with these dimensions, as best as I could determine with the unaided eye.

SC FGCOATINGS VIII. STACK/VENT RESTRICTIONS 4. This limits the dimensions of stack #1 to a maximum exhaust diameter of 22 inches and minimum height of 29 feet.

INSPECTION RESULT: COMPLIANCE. Stack #4 appeared to be in accordance with these dimensions, as best as I could determine with the unaided eye.

FGCOATINGS IX. OTHER REQUIREMENTS

NA

FGMETALPARTS

DESCRIPTION: All metal parts coating lines source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA**FGMETAL PARTS I. EMISSION LIMITS**

1. VOC is limited to less than 30.0 tpy, over a 12-month rolling time period as determined at the end of each calendar month. The equipment this applies to is all metal parts coating lines source-wide.

INSPECTION RESULT: COMPLIANCE. The spreadsheet emailed to AQD on 3/7/2020 in support of the MAERS submittal for the 2019 operating year shows that the highest 12-month rolling value for VOCs for the entire plant was 9.63 tons, in December 2019. However, the year 2019 was represented in the spreadsheet as 2007. AQD contacted the company, and confirmed that the intended year was 2019. The spreadsheet Aristeo used was one that made for the regulated community to use years ago, by what was then the Michigan DEQ (now EGLE), and the year 2007 appears to have been simply an artifact of the spreadsheet.

FGMETAL PARTS II. MATERIAL LIMITS

NA

FGMETAL PARTS III. PROCESS/OPERATIONAL RESTRICTIONS

NA

FGMETAL PARTS IV. DESIGN/EQUIPMENT PARAMETERS

NA

FGMETAL PARTS 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 used to coat metal parts, 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 336.1702(d))

INSPECTION RESULT: COMPLIANCE. COMPLIANCE. In a 7/16/2019 email, Aristeo requested approval from AQD to use manufacturer's formulation data in lieu of Method 24. In an 8/14/2019 letter, AQD approved the request. The facility is keeping Safety Data Sheets (SDS), formerly known as Material Safety Data Sheets, in addition to Environmental Data Sheets (EDS). These were provided to AQD, during the permit application process, and are in the district and central office permit files.

FGMETAL PARTS 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 last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1702(d))

INSPECTION RESULT: COMPLIANCE. The calculations were in a format acceptable to AQD, utilizing the spreadsheet made for industry by what was once the DEQ (now EGLE). It is my understanding that the coating use logs are turned in to the office at the end of each work day, and that they are entered into the spreadsheet by their office manager the following work morning.

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating and reducer including the weight percent of each component. The data may consist of 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 336.1702(d))

INSPECTION RESULT: COMPLIANCE. The company submitted numerous Safety Data Sheets (SDS) and Environmental Data Sheets (EDS), during the permit application process. On 7/24/2019, several months after approval of their PTI, they submitted SDS and EDS to AQD, to inform AQD of a new, less toxic primer they would like to use. This new coating was identified as Kem-Flash 500 HAPs Primer, a less toxic version of their current Kem-Flash 500 primer. It appears the company is keeping these records on file. The potential use of additional, less toxic coatings under the Rule 282(2)(b) exemption has been discussed earlier in this report.

3. The permittee shall keep the following information on a monthly basis for all metal parts coating lines source-wide, including metal parts coating lines covered by other permits, which are exempted by R 336.1621(10)(b):

a) Gallons or pounds of each VOC containing material used.

INSPECTION RESULT: COMPLIANCE. The spreadsheets for the 3 paint areas which were emailed to AQD on 10/21/2019 identify the gallons of each VOC containing material used on both a daily and monthly basis.

b) VOC content, in pounds per gallon or pounds per pound as applied, of each VOC containing material used.

INSPECTION RESULT: COMPLIANCE. The spreadsheets which were emailed to AQD on 3/7/2020, in support of the MAERS submittal for the 2019 operating year, show VOC content of each material used for coating metal parts, in lbs/gallon.

c) VOC emission calculations determining the monthly emission rate in tons per calendar month.

INSPECTION RESULT: COMPLIANCE. The spreadsheets emailed to AQD on 10/21/2019 show VOC emissions for each

paint area, in either lbs/month (which can easily be converted to tons, by dividing by 2,000). The spreadsheets emailed to AQD on 3/7/2020 show VOC emissions plantwide, in tons per calendar month.

d) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

INSPECTION RESULT: COMPLIANCE. The spreadsheets emailed to AQD on 3/7/2020 show VOC emissions plantwide, in tons per 12-month rolling time period, as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and 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 336.1702(d))

INSPECTION RESULT: COMPLIANCE. The company is keeping their records using mass balance. The records have been made available to the Department. AQD NEEDS TO CONTACT THE COMPANY, REGARDING THEIR SPREADSHEET IN SUPPORT OF THE MAERS SUBMITTAL FOR THE 2019 OPERATING YEAR LISTING THE YEAR AS 2007.

FGMETAL PARTS VII. REPORTING

NA

FGMETAL PARTS VIII. STACK/VENT RESTRICTIONS

NA

FGMETAL PARTS IX. OTHER REQUIREMENTS

NA

Footnotes:

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

FGFACILITY

POLLUTION CONTROL EQUIPMENT: NA

FGFACILITY I. EMISSION LIMITS

1. Each individual HAP in FGFACILITY is limited to less than 8.9 tpy, over a 12-month rolling time period as determined at the end of each calendar month.

INSPECTION RESULT: COMPLIANCE. The spreadsheet emailed to AQD on 3/7/2020 in support of the MAERS submittal for the 2019 operating year shows that the HAP with the highest emissions in 2019 was xylenes (isomers and mixtures) with a 12-month rolling total in December 2019 of 1.13 tons. This is far below

the 8.9 ton per year limit for a single HAP.

2. Aggregate, or total, HAPs in FGFACILITY are limited to less than 22.4 tpy, over a 12-month rolling time period as determined at the end of each calendar month.

INSPECTION RESULT: COMPLIANCE. The spreadsheet emailed to AQD on 3/7/2020 in support of the MAERS submittal for the 2019 operating year shows that the highest 12-month rolling value for all HAPs combined for the entire plant was 2.04 tons in December 2019. This is far below the 22.4 TPY limit.

3. Methyl isobutyl ketone (CAS# 108-10-1), or MIBK, from FGFACILITY is limited to 5.0 tpy, over a 12-month rolling time period as determined at the end of each calendar month. This condition is state-enforceable only, as It was established prior to MAPC Rule 225.

INSPECTION RESULT: COMPLIANCE. The spreadsheet emailed to AQD on 3/7/2020 in support of the MAERS submittal for the 2019 operating year shows that the highest 12-month rolling value for MIBK was 0.24 tons, for December 2019. This is far below the 5.0 TPY limit.

4. Cumene (CAS# 98-82-8) from FGFACILITY is limited to 600 lbs/year, over a 12-month rolling time period as determined at the end of each calendar month. This condition is state-enforceable only, as It was established prior to MAPC Rule 225.

INSPECTION RESULT: COMPLIANCE. The spreadsheets from 3/7/2020 and 10/21/2019 show that there were no emissions of cumene in 2019. The 600 lbs/year limit was not exceeded.

5. Ethylbenzene (CAS# 100-41-4) from FGFACILITY is limited to 1.2 tpy, over a 12-month rolling time period as determined at the end of each calendar month. This condition is state-enforceable only, as It was established prior to MAPC Rule 225.

INSPECTION RESULT: COMPLIANCE. The spreadsheet emailed to AQD on 3/7/2020 in support of the MAERS submittal for the 2019 operating year shows that the highest 12-month rolling value for ethyl benzene was 0.21 tons, for December 2019. This is well below the 1.2 TPY limit.

6. Styrene (CAS# 100-42-5) is limited to 5.0 tpy, over a 12-month rolling time period as determined at the end of each calendar month. This condition is state-enforceable only, as It was established prior to MAPC Rule 225.

INSPECTION RESULT: COMPLIANCE. The spreadsheet emailed to AQD on 3/7/2020 in support of the MAERS submittal for the 2019 operating year shows that the highest 12-month rolling value for styrene was 0.24 tons, for December 2019. This is far below the 5.0 TPY limit.

*** Beginning on the issuance date of this PTI, and continuing for the first 12 calendar months, this limit applies**

to the cumulative total HAP emissions. Thereafter, the limit shall become a 12-month rolling limit.

FGFACILITY II. MATERIAL LIMITS

NA

FGFACILITY III. PROCESS/OPERATIONAL RESTRICTIONS

NA

FGFACILITY IV. DESIGN/EQUIPMENT PARAMETERS

NA

FGFACILITY 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.

INSPECTION RESULT: COMPLIANCE. The facility has determined the HAP content of materials as received and as applied, using manufacturer's formulation data. The AQD Lansing District Office has not requested verification of manufacturer's HAP formulation data, at this time.

FGFACILITY 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.1 (R 336.1205(3), R 336.1225)

INSPECTION RESULT: COMPLIANCE. The permittee has completed all required calculations in a format acceptable to AQD. It is my understanding that at the end of the day, operator's log sheets for coatings used are brought to the office, and entered no later than the next morning into Aristeo's recordkeeping program. This automatically does the calculations, well ahead of the 15th day of the calendar month, for the previous calendar month.

2. 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 and make them available to the Department upon request.1 (R 336.1205(3), R 336.1225)

INSPECTION RESULT: COMPLIANCE. The permittee appears to maintain a current listing from the manufacturers of Safety Data Sheets and Environmental Data Sheets for their raw materials. These were provided to AQD during the New Source Review process, as the opt-out permit application was being reviewed.

3. The permittee shall keep the following information on a calendar month basis for FGFACILITY:

a) Gallons or pounds of each HAP containing material used.

INSPECTION RESULT: COMPLIANCE. The spreadsheets provided to AQD on 10/21/2019 and 3/7/2020 document gallons and pounds of each HAP containing material used.

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

INSPECTION RESULT: COMPLIANCE. Aristeo did not document any HAP containing material reclaimed. I advised them that if they reclaim any materials used, they would be eligible to deduct this value from the amount of that raw material used and therefore able to deduct that from the amount of that raw material emitted.

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

INSPECTION RESULT: COMPLIANCE. The spreadsheet provided to AQD on 3/7/2020 documents HAP content in lbs/gal of each of their raw materials.

d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.

INSPECTION RESULT: COMPLIANCE. The spreadsheet provided to AQD on 10/21/2019 document individual and aggregate HAPs in pounds, while the spreadsheet provided to AQD on 3/7/2020 provides the monthly emission rate 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.

INSPECTION RESULT: COMPLIANCE. The spreadsheet provided to AQD on 3/7/2020 shows individual and total, or aggregate, HAP emissions in tons per 12-month rolling time period at the end of each calendar month.

The permittee shall keep records using mass balance or an alternate method and 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))

INSPECTION RESULT: COMPLIANCE. The permittee is keeping records using mass balance, and has made them available to EGLE.

4. The permittee shall keep the following information on a calendar month basis for FGFACILITY:

a) Gallons of each methyl isobutyl ketone (MIBK) containing material used.

INSPECTION RESULT: COMPLIANCE. The spreadsheets provided to AQD on 10/21/2019 and 3/7/2020 document gallons and pounds of each MIBK containing material used.

b) Where applicable, gallons of each MIBK containing material reclaimed.

INSPECTION RESULT: NONAPPLICABLE. Aristeo did not document any MIBK containing material reclaimed. I advised them that if they reclaim any materials used, they would be eligible to deduct this value from the amount of that raw material used and therefore able to deduct that from the amount of that raw material emitted.

c) The MIBK content, in pounds per gallon of each methyl isobutyl ketone containing material used.

INSPECTION RESULT: COMPLIANCE. The spreadsheet provided to AQD on 3/7/2020 documents MIBK content in lbs/gal of each of their raw materials.

d) Methyl isobutyl ketone emission calculations determining the monthly emission rate in tons per calendar month.

INSPECTION RESULT: COMPLIANCE. The spreadsheet provided to AQD on 10/21/2019 document MIBK emissions in pounds, while the spreadsheet provided to AQD on 3/7/2020 provides the monthly emission rate in tons per calendar month.

e) Methyl isobutyl ketone emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

INSPECTION RESULT: COMPLIANCE. The spreadsheet provided to AQD on 3/7/2020 shows the MIBK emission rate in tons per 12-month rolling time period at the end of each calendar month.

The permittee shall keep records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.1 (R 336.1225(2))

INSPECTION RESULT: COMPLIANCE. The permittee is keeping records using mass balance, and has made them available to EGLE.

5. The permittee shall keep the following information on a calendar month basis for FGFACILITY:

a) Gallons of each cumene containing material used.

INSPECTION RESULT: NONAPPLICABLE. The spreadsheets from 3/7/2020 and 10/21/2019 show that there was no usage of cumene materials in 2019.

b) Where applicable, gallons of each cumene containing material reclaimed.

INSPECTION RESULT: NONAPPLICABLE. The spreadsheets from 3/7/2020 and 10/21/2019 show that there was no usage of cumene containing materials in 2019.

c) The cumene content, in pounds per gallon of each cumene containing material used.

INSPECTION RESULT: NONAPPLICABLE. The spreadsheets from 3/7/2020 and 10/21/2019 show that there were no usage of cumene containing materials in 2019.

d) Cumene emission calculations determining the monthly emission rate in pounds per calendar month.

INSPECTION RESULT: NONAPPLICABLE. The spreadsheets from 3/7/2020 and 10/21/2019 show that there were no emissions of cumene in 2019.

e) Cumene emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

INSPECTION RESULT: NONAPPLICABLE. The spreadsheets from 3/7/2020 and 10/21/2019 show that there were no emissions of cumene in 2019.

The permittee shall keep records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.1 (R 336.1225(2))

INSPECTION RESULT: COMPLIANCE. The permittee is keeping records, using mass balance. These records were made available to EGLE.

6. The permittee shall keep the following information on a calendar month basis for FGFACILITY:

a) Gallons of each ethylbenzene containing material used.

INSPECTION RESULT: COMPLIANCE. The spreadsheets provided to AQD on 10/21/2019 and 3/7/2020 document gallons and pounds of each ethylbenzene containing material used.

b) Where applicable, gallons of each ethylbenzene containing material reclaimed.

INSPECTION RESULT: NONAPPLICABLE. Aristeo did not document any ethylbenzene containing material reclaimed. I advised them that if they reclaim any materials used, they would be eligible to deduct this value from the amount of that raw material used and therefore able to deduct that from the amount of that raw material emitted.

c) The ethylbenzene content, in pounds per gallon of each ethylbenzene containing material used.

INSPECTION RESULT: COMPLIANCE. The spreadsheet provided to AQD on 3/7/2020 documents the ethylbenzene content in lbs/gal of each of their raw materials.

d) Ethylbenzene emission calculations determining the monthly emission rate in tons per calendar month.

INSPECTION RESULT: COMPLIANCE. The spreadsheet provided to AQD on 10/21/2019 document ethylbenzene emissions in pounds, while the spreadsheet provided to AQD on 3/7/2020 provides the monthly emission rate in tons per calendar month.

e) Ethylbenzene emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

INSPECTION RESULT: COMPLIANCE. The spreadsheet provided to AQD on 3/7/2020 shows the ethylbenzene emission rate in tons per 12-month rolling time period at the end of each calendar month.

The permittee shall keep records using mass balance or an alternate method and format acceptable to the AQD

District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.1 (R 336.1225(2))

INSPECTION RESULT: COMPLIANCE. The permittee is keeping records, using mass balance. These records were made available to EGLE.

7. The permittee shall keep the following information on a calendar month basis for FGFACILITY:

a) Gallons of each styrene containing material used.

INSPECTION RESULT: COMPLIANCE. The spreadsheets provided to AQD on 10/21/2019 and 3/7/2020 document gallons and pounds of each styrene containing material used.

b) Where applicable, gallons of each styrene containing material reclaimed.

INSPECTION RESULT: NONAPPLICABLE. Aristeo did not document any ethylbenzene containing material reclaimed. I advised them that if they reclaim any materials used, they would be eligible to deduct this value from the amount of that raw material used and therefore able to deduct that from the amount of that raw material emitted.

c) The styrene content, in pounds per gallon of each styrene containing material used.

INSPECTION RESULT: COMPLIANCE. The spreadsheet provided to AQD on 3/7/2020 documents the styrene content in lbs/gal of each of their raw materials.

d) Styrene emission calculations determining the monthly emission rate in pounds per calendar month.

INSPECTION RESULT: COMPLIANCE. The spreadsheet provided to AQD on 10/21/2019 document ethyl styrene emissions in pounds, while the spreadsheet provided to AQD on 3/7/2020 provides the monthly emission rate in tons per calendar month.

e) Styrene emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

INSPECTION RESULT: COMPLIANCE. The spreadsheet provided to AQD on 3/7/2020 shows the styrene emission rate in tons per 12-month rolling time period at the end of each calendar month.

The permittee shall keep records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.1 (R 336.1225(2))

INSPECTION RESULT: COMPLIANCE. The permittee is keeping records, using mass balance. These records were made available to EGLE.

FGFACILITY VII. REPORTING

NA

FGFACILITY VIII. STACK/VENT RESTRICTIONS

NA

FGFACILITY IX. OTHER REQUIREMENTS

NA

Footnotes:

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

I left the site at 2:38 PM.

Conclusion:

No instances of noncompliance could be identified after checking compliance with each special condition in Aristeo's opt-out PTI No. 161-18. AQD will respond to future complaints, as time and resources allow, and will conduct odor surveys when in the area.

NAME *Daniel A. McLean*

DATE 9/8/2020

SUPERVISOR *B.M.*