

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

P101454215

FACILITY: Ground Effects, LLC		SRN / ID: P1014
LOCATION: 3302 Kent Street, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Allen Kinsler , Environmental Engineer		ACTIVITY DATE: 07/09/2020
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection of new facility which has not previously been inspected by AQD.		
RESOLVED COMPLAINTS:		

On 7/9/2020, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a scheduled inspection of Ground Effects, LLC's Kent Street facility, which had recently received a permit to install (PTI) from AQD.

Environmental contacts:

- Allen Kinsler, Environmental Engineer; 313-462-2290; akinsler@gfxltd.com
- Brooks Pattison, Environmental Systems Manager; bpattison@gfxltd.com

Facility description:

Ground Effects, LLC's Kent Street facility in Flint applies polyurethane liners to pickup truck beds, with coating spray equipment. Associated activities include surface cleaning before liner application, and cleanup afterward.

Emission units:

Emission unit* IDs	Emission unit description for each unit	Permit to Install No.	Compliance status
EU-CoatingLn-1	Coating line with a heated spray booth for polyurethane coating of truck beds. Before entering the booth, the trucks are cleaned manually with an inbound cleaning solvent. Inside the booth, a coating of bonding agent (primer) and a two-component coating are applied by an automated spray process. Following the application, trucks are cleaned for overspray with an outbound cleaning solvent. Repairs are performed using a repair solvent on vehicles pulled offline due to defects. The trucks are air-dried before transporting to the customer. The spray booth is equipped with particulate control filters	57-19	Compliance
EU-CoatingLn-2	See above description.	57-19	Compliance
EU-CoatingLn-3	See above description.	57-19	Compliance
EU-CoatingLn-4	See above description.	57-19	Compliance
EU-CoatingLn-5	See above description.	57-19	Compliance
EU-CoatingLn-6	See above description.	57-19	Compliance
EU-CoatingLn-7	See above description.	57-19	Compliance
EU-CoatingLn-8	See above description.	57-19	Not installed

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

Regulatory overview:

Flexible group** ID	Flexible group description	Associated emission unit IDs
FG-CoatingLns	Coating lines for polyurethane coatings of truck beds including solvent use for pre-cleaning, overspray removal, and offline repair.	EU-CoatingLn-1, EUCoatingLn-2, EUCoatingLn-3, EUCoatingLn-4, EUCoatingLn-5, EU-CoatingLn-6, EUCoatingLn-7, EU-CoatingLn-8

**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 had operated five spray coating booths to apply polyurethane liners to pickup truck beds. These booths were considered by the company to be exempt from the requirement of Michigan Air Pollution Control (MAPC) Rule 201 to obtain a permit to install. Upon deciding to install 3 more coating booths, the company submitted a permit to install application.

Opt-out Permit to Install (PTI) No. 57-19 was approved on 7/19/2019. It contains enforceable restrictions which limit the potential to emit (PTE) of hazardous air pollutants (HAPs) to keep it from becoming a major source, subject to the Renewable Operating Permit (ROP) program. A major HAPs source has a PTE of 10 TPY or more of a single HAP, or 25 TPY or more of aggregate HAPs.

This facility is not considered a major source of criteria pollutants, that is, those air pollutants for which a National Ambient Air Quality Standards is set by the U.S. Environmental Protection Agency. These include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns in diameter (PM-10), and particulate matter smaller than 2.5 microns in diameter (PM2.5). A major source has the PTE of 100 tons per year (TPY) or more of any one of the criteria pollutants. The PTE for VOCs for this facility is 61.4, below the major source threshold.

The facility is not considered subject to 40 CFR Part 63, Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations for Area Sources*. They do not conduct any paint stripping, and the coatings they apply do not contain any of the HAPs which are targeted by this regulation.

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:

This facility is located in an industrial and commercial area within the City of Flint, slightly east of Dort Highway. There is a north plant, and a south plant, known as the Lippincott building, which is a short distance to the southeast. There were numerous light industries in the immediately surrounding area, although 500 feet to the east of the north plant is a residential neighborhood. The closest residences to the Lippincott building are in a residential neighborhood which is about 500 feet to the west.

History:

This facility operated their 5 original coating booths for a number of years as exempt from needing a

permit to install. Their interest in installing 3 additional coating booths prompted the decision to submit an opt-out permit application. This facility had never been inspected by AQD prior to today, although I had attempted to conduct an unannounced inspection of the facility earlier this year. The environmental contact was not onsite at this time, so the decision was made to conduct an inspection at a later date.

Safety attire required:

I wore steel-toed boots and safety glasses during the course of the inspection. Additionally, due to the COVID-19 pandemic, I was wearing a disposable paper mask, per EGLE guidance to inspectors. This guidance is discussed further under the section of this report titled "Arrival".

Odor evaluation:

Weather conditions at 12:50 PM on 7/9/2020 were partly cloudy, humid, and 92 degrees F, with winds out of the south at 0 to 5 miles per hour (mph). I checked for odors north of the plant, an Kent Street and Kelso Street, as this put me in a downwind location. No odors could be detected.

Arrival:

As of this point in the COVID-19 pandemic, EGLE guidance to inspectors on conducting inspections was as follows:

- pre-arrange inspections with facilities, to facilitate a plan to conduct the inspection while adhering to facility guidelines for safety,
- wear a mask, where social distancing of at least 6 feet is not possible, and

Therefore, the time and date for this inspection had been pre-arranged with the Ground Effects environmental contacts.

I arrived at the plant by 12:58 PM, going through the security gate, and following instructions to reach the office. The only odor I could detect was the scent of new tires from one or more of the new GM trucks parked onsite. There were no visible emissions from the exhaust stacks on the main plant building.

Upon entering the office lobby, I underwent a temperature check, and took a health assessment quiz, using my Smartphone, per the instructions I received from a Ground Effects employee. I then met with Mr. Allen Kinsler, Environmental Engineer, Mr. Robert VanDyke, Plant Manager, Mr. Mark Hilliker, production Manager, and Mr. Brooks Pattison, Environmental Systems Manager.

Pre-inspection meeting:

I explained the purpose of this visit. It is an objective of the AQD to inspect newly permitted facilities within 4 months after they are permitted, although it had been almost 12 months since their permit was approved. I also explained that one of the inspection goals of AQD is to inspect each facility with an opt-out permit once every 4 years, pursuant to the Compliance Monitoring Strategy that AQD follows.

This plant is about 5 miles from GM Flint Assembly. I was informed that this plant will soon be relocated to Van Slyke Road, much closer to GM Flint Assembly. This is because GM wants them to be within 3.5 miles of Flint Assembly, which is a standard requirement for companies who do work for GM, as I understand it. The stated start date of operations for the new plant, will be 1/4/2021, I was told. Subsequent to this inspection, the Van Slyke Road facility was assigned State Registration Number (SRN) P1122.

I was informed that they operate with 3 shifts, 5 days per week, and occasionally on Saturdays, but rarely on Sundays. They were shut down from 3/20 to 5/25/2020 due to the COVID-19 pandemic, but are back up to regular production now, I was told.

Inspection:

The north plant contains their existing coating lines EU-CoatingLn-1 through EU-CoatingLn-5, with provisions for a sixth coating line, while the Lippincott building contains the newest booths, EU-CoatingLn-6 and EU-CoatingLn-7.

I was accompanied on the inspection by Mr. Kinsler, Mr. Van Dyke, and Mr. Patterson. We started out by walking to the Lippincott building. There were no odors detectable outdoors, as we approached the building. There were no visible emissions from the roof line and associated stacks. Weather conditions were partly to mostly sunny and about 90 degrees F, with winds out of the south at 0-5 mph.

I was shown that the exhaust from the coating lines is controlled by dry particulate filters. This includes "pocket filters" and orange fiberglass filtration material in the walls of the booths. There are also intake filters for each booth, which clean the incoming air, to help ensure product quality. I was told that once per month, they change out the intake air filters and the exhaust pocket filters. In addition, at the end of each shift, they trim off the orange filter material and unroll clean filter material from rolls which supply the booths.

Operating data was collected on booths 6 and 7 in the Lippincott building, as follows:

EU-CoatingLn-6:

- Pressure drop: 0.18 inches, water column (w.c.):
- Booth set point (SP): 90 degrees F
- Booth process value (PV): 103 degrees F*

*I was informed that this was due to the ambient temperature of 92 degrees F outside today.

EU-CoatingLn-7:

- Pressure drop: 0.1 inches, w.c.
- Booth SP: 90 degrees F
- Booth PV: 104 degrees F

The pickups are masked off with paper and tape, to protect areas of the trucks where the urethane coating is not wanted. I inquired as to how the pre-cleaning process was done. A Ground Effects employee demonstrated the pre-cleaning process. She applied a prepwash to a pickup truck bed with a cloth. I was informed that the prepwash is 70% isopropyl alcohol (IPA), and 30% water.

A bonding agent is applied in the coating booths, somewhat like a primer, as I understand it. I was informed that 30 seconds after the bonding agent is applied, the actual urethane coating itself is applied. The heated booths are said to help the bonding agent flash off properly. The bonding agent is kept in closed containers. The two-part polyurethane coating has separate totes for the A part and the B part, I was shown.

After the urethane coating is applied, denatured alcohol is used to clean up residue from the tape, I was told.

For coating finishes where touch up is needed, there are rework stations, I was informed, which use a bonding material with a 2-part epoxy. More major work may involve sanding or stripping off a large area, and going back through a coating booth again, I was told.

We returned to the north plant, where EU-CoatingLn-1 through EU-CoatingLn-5 are located. Data was collected as follows:

EU-CoatingLn-1, not operating at this time:

- Pressure drop: 0.05 inches, w.c.
- Booth SP: 90 degrees F
- Booth PV: 94.8 degrees F

EU-CoatingLn-2, not operating at this time:

- Pressure drop: 0.0 inches, w.c.
- Booth SP: 90 degrees F
- Booth PV: 98.3 degrees F

EU-CoatingLn-3, operating at this time:

- Pressure drop: 0.13 inches, w.c.
- Booth SP: 90 degrees F
- Booth PV: 93.9 degrees F

EU-CoatingLn-4, operating at this time:

- Pressure drop: 0.12-0.13 inches, w.c.
- Booth SP: 90 degrees F
- Booth PV: 102.2 degrees F

EU-CoatingLn-5, not operating at this time:

- Pressure drop: 0 inches, w.c.
- Booth SP: NA degrees F
- Booth PV: NA degrees F

Certain components of the two-part polyurethane coating system are considered to react immediately and not be emitted, as indicated by AQD Senior Engineer Specialist Paul Schleusener, during his review of the PTI application 57-19. This includes:

- 4-Methyl-1, 3-dioxolan-2-one in Coating A
- "Aromatic amine" in Coating B

The materials are applied through a "mixing head"-type applicator which is designed to thoroughly mix reactants and allow the chemical reaction to begin before the components contact the air, as P. Schleusener noted. Coating A and Coating B contain VOCs, but the reacted mixture which is applied to the pickup truck bed has essentially zero VOC content.

I did not observe any visible emissions from either the north plant or the Lippincott building. No odors were detected outside either building. Facility housekeeping was good.

Compliance check with PTI No. 57-19:

Compliance with the special conditions of PTI No. 57-19 was checked by reviewing the conditions for the flexible group FG-CoatingLns and FGFACILITY. Please see the compliance summary below.

Flexible Group FG-CoatingLns:

FG-CoatingLns Special Condition (SC) I. EMISSION LIMIT(S): This limits VOC emissions to 61.0 TPY.

COMPLIANCE STATUS: COMPLIANCE. The day after the inspection, Mr. Kinsler emailed to me facility recordkeeping from January 2020 through the end of June, year to date (YTD). The 12-month rolling total for VOCs at the end of June was 4.4 tons, far below the 61.0 TPY limit. This was the highest monthly value for the 12-month rolling total. At no time were their reported emissions over the limit.

SC II. MATERIAL LIMIT(S) 1: This limits use of isopropyl alcohol (IPA) to 94,195 lbs/yr, on a 12-month rolling time period as determined at the end of each calendar month.

COMPLIANCE STATUS: COMPLIANCE. The day after the inspection, Mr. Kinsler emailed to me facility recordkeeping from January 2020 through the end of June, year to date (YTD). The 12-month rolling total for usage of IPA at the end of June was 5,345.36 lbs, far below the limit. At no time did their reported usage exceed the limit.

SC II. MATERIAL LIMIT(S) 2: This limits maximum VOC content for primer/bonding agent to 1.6 lb/gal minus water as applied, on an instantaneous basis.

COMPLIANCE STATUS: The day after the inspection, Mr. Kinsler emailed to me facility recordkeeping from January 2020 through the end of June, year to date (YTD). The maximum VOC content for the primer/bonding agent called "Ultimate Linings Bonding Agent" was 1.56 lbs VOC/gal, below the limit.

SC II. MATERIAL LIMIT(S) 3: This requires the permittee to only use the repair solvent for offline repair.

COMPLIANCE STATUS: COMPLIANCE. I emailed the facility on 9/25/2020, to inquire about the repair solvent. Their response on 9/30 indicated that only the repair solvent is used for offline repair.

SC III. PROCESS/OPERATIONAL RESTRICTION(S) 1: This requires the permittee to recover and reclaim, recycle, or dispose of coatings, thinner, and/or purge and cleanup solvents in accordance with all applicable regulations.

COMPLIANCE STATUS: COMPLIANCE. I saw that waste solvents were kept in closed containers, while awaiting removal as hazardous waste. I was told that the waste solvent may contain a small amount of denatured alcohol.

SC III. PROCESS/OPERATIONAL RESTRICTION(S) 2: This requires the permittee to capture all waste materials and store them in closed containers, as well as to dispose of all waste materials in compliance with applicable state and local regulations.

COMPLIANCE STATUS: COMPLIANCE. I saw that waste solvents were kept in closed containers, while awaiting removal as hazardous waste. I was told that grease is stored in a solid waste drum, prior to disposal.

SC III. PROCESS/OPERATIONAL RESTRICTION(S) 3: This requires the permittee to dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.

COMPLIANCE STATUS: COMPLIANCE. I was told that the used particulate filters are disposed of as solid waste. It is my understanding that a dumpster is used for disposal.

SC III. PROCESS/OPERATIONAL RESTRICTION(S) 4: This requires the permittee 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. The permittee is to keep containers covered at all times except when operator access is necessary.

COMPLIANCE STATUS: COMPLIANCE. All containers which I saw containing coating materials were covered, during the inspection.

SC IV. DESIGN/EQUIPMENT PARAMETER(S): 1: This requires any coating line to not be operated unless its respective exhaust filters are installed, maintained, and operated in a satisfactory manner.

COMPLIANCE STATUS: COMPLIANCE. The exhaust filters which I observed in the coating booths today all appeared to be in satisfactory condition.

SC IV. DESIGN/EQUIPMENT PARAMETER(S): 2: This requires the permittee to equip and maintain each coating line with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.

COMPLIANCE STATUS: COMPLIANCE. I was informed that the spray guns that they use are more efficient than HVLP applicators. I inquired further about their applicators, in a 9/25/2030 email. Mr. Kinsler replied in a 9/30 email with attachments, please see AQD digital file. The email attachments included documents on the two types of applicators they use, one of them an HVLP, and the other a more efficient design. Also attached was a summary from their consultant on transfer efficiency, documenting that their high pressure airless spray gun is more efficient than an HVLP applicator.

The text of Mr. Kinsler's answer to my question is copied and pasted below:

Ground Effects uses two spray guns in the spray booths. The first is an HVLP spray gun (Graco 24A756) used for Bonding Agent. I have attached a brochure for this unit.

The spray gun used for the bed liner material is a high pressure airless spray gun, Graco Probler P2. These types of applicators have a rated Transfer Efficiency of 75% - 80%, equivalent to or higher than the HVLP. I have attached a summary from our Consultant showing this. I have also seen this range in US EPA Guidance including EPA 560/4-88-004d "Estimating Chemical Releases from Spray Application of Organic Coatings".

SC V. TESTING/SAMPLING 1: This requires the permittee to use federal Reference Test Method 24 to determine VOC content of any coating, although upon prior written approval from the AQD District Supervisor, manufacturer's formulation data may be used.

COMPLIANCE STATUS: COMPLIANCE. On 3/6/2020, AQD received a written request from the facility to use manufacturer's formulation data in lieu of EPA Test Method 24 to determine the VOC content of coating materials. AQD subsequently approved this request, in a letter dated 5/5/2020.

SC VI. MONITORING/RECORDKEEPING 1: This requires the permittee to complete all required calculations in a format acceptable to the district supervisor by the 15th day of the calendar month for the previous calendar month, unless otherwise specified.

COMPLIANCE STATUS: COMPLIANCE. On 7/10/2020, the day after the inspection, Mr. Kinsler emailed me facility recordkeeping for 2020, YTD. The format was acceptable. The calculations for the previous month, June, were up to date, and it was not yet the 15th of July, so they are in compliance with this condition.

SC VI. MONITORING/RECORDKEEPING 2: This requires the permittee to maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component.

COMPLIANCE STATUS: COMPLIANCE. On 7/10/2020, Mr. Kinsler emailed me facility recordkeeping for 2020 YTD. The spreadsheets showing composition of their materials verified that they are maintaining a current listing of the chemical composition of each material, including weight percent.

SC VI. MONITORING/RECORDKEEPING 3: The permittee is required to keep the following on a monthly basis for FG-CoatingLns:

- a.) Gallons of each material used and reclaimed.
- b.) VOC content of each material with and without water and exempt solvent as received and as applied.
- c.) VOC mass emission calculations determining 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.

COMPLIANCE STATUS:

- a.) *COMPLIANCE. They are tracking gallons of each material used. They also have a spreadsheet for VOC credits which appeared to track liquid waste reclaimed.*
- b.) *PENDING. They are tracking VOC content of each material, which appears to me to be as received. On 9/25/2020, I emailed the company to ask if they track VOC content with and without water and exempt solvent as received and as applied. The answer is pending as of the date this report is being finalized, and the company's response will be copied to the AQD plant file, upon receipt.*
- c.) *COMPLIANCE. VOC emissions are recorded in tons per calendar month in the recordkeeping I received on 7/10/2020.*
- d.) *COMPLIANCE. VOC emissions are recorded in tons per 12-month rolling time period as determined at the end of each calendar month in the recordkeeping I received on 7/10/2020*

SC VI. MONITORING/RECORDKEEPING 4: The permittee is required to keep the following on a monthly basis for FG-CoatingLns:

- a.) IPA alcohol content of each material used and reclaimed.
- b.) IPA alcohol usage calculations determining the monthly usage rate in lbs per calendar month.
- c.) IPA usage calculations determining the annual usage rate in lbs per 12-month rolling time period as determined at the end of each calendar month.

COMPLIANCE STATUS:

- a.) *COMPLIANCE. They are tracking IPA alcohol content as received.*
- b.) *COMPLIANCE: They are tracking usage rate in lbs per calendar month.*
- c.) *COMPLIANCE: They are tracking usage rate in lbs per calendar month.*

SC VII. REPORTING:

COMPLIANCE STATUS: COMPLIANCE. On 7/6/2020, AQD received the facility's notification of completion of installation of permitted equipment, under PTI No. 57-19, Special Condition FG-CoatingLns VII. 1.

SC VIII. STACK/VENT RESTRICTIONS: This requires the exhaust stacks for each booth to have a maximum exhaust diameter of 42 inches and a minimum height above ground of 42 feet.

COMPLIANCE STATUS: COMPLIANCE. I did not note the stack heights during this inspection. On 9/25/2020, I emailed the company to inquire as to the stack dimensions. Mr. Kinsler emailed me on 9/30, and confirmed that their exhaust stacks are meeting these dimensions.

SC IX. OTHER REQUIREMENT(S):

NA.

Flexible Group FGFACILITY:

FGFACILITY SC I. EMISSION LIMIT(S) 1: This limits emissions of each individual HAP to less than 8.9 TPY, to keep the facility from becoming a major source for a single HAP.

COMPLIANCE STATUS: COMPLIANCE. Each individual HAP emitted in 2020 YTD has been far below 8.9 tons. 157.64 lbs or 0.08 tons of denatured ethyl alcohol were emitted in 2020, YTD. At the end of 2020 emissions are likely to be far below the permit limit. 97.67 lbs or 0.05 tons of All Solve have been reported as emitted in 2020, YTD. At the end of 2020 emissions are likely to be far below the permit limit.

SC I. EMISSION LIMIT(S) 2: This limits emissions of aggregate, or total, HAPs to less than 22.4 TPY, to keep the facility from becoming a major source for aggregate HAPs.

COMPLIANCE STATUS: COMPLIANCE. The 12-month rolling total for total HAPs emitted in 2020 YTD was reported as 255.31 lbs or 0.13 tons at the end of June, far below the permit limit.

SC II. MATERIAL LIMIT(S) 1:

NA

SC III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

SC IV. DESIGN/EQUIPMENT PARAMETER(S):

NA

SC IV. DESIGN/EQUIPMENT PARAMETER(S): 2

SC V. TESTING/SAMPLING 1: The permittee is required to determine the HAP content of any material as applied and received using manufacturer's formulation data.

COMPLIANCE STATUS: COMPLIANCE. They appear to be doing this, as demonstrated by recordkeeping of HAP content and HAP emissions.

SC VI. MONITORING/RECORDKEEPING 1: This requires the permittee to complete all required calculations in a format acceptable to the district supervisor by the 15th day of the calendar month for the previous calendar month, unless otherwise specified.

COMPLIANCE STATUS: COMPLIANCE. On 7/10/2020, the day after the inspection, Mr. Kinsler emailed me facility recordkeeping for 2020, YTD. The format was acceptable. The calculations for the previous month, June, were up to date, and it was not yet the 15th of July, so they are in compliance with this condition.

SC VI. MONITORING/RECORDKEEPING 2: This requires the permittee to maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component.

COMPLIANCE STATUS: COMPLIANCE. On 7/10/2020, Mr. Kinsler emailed me facility recordkeeping for 2020 YTD. The spreadsheets showing composition of their materials verified that they are maintaining a current listing of the chemical composition of each material, including weight percent.

SC VI. MONITORING/RECORDKEEPING 3: The permittee is required to keep the following on a monthly basis for FG FACILITY:

- a.) Gallons or lbs of each HAP containing material used.
- b.) Gallons or lbs of each HAP containing material reclaimed.
- c.) HAP content 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 monthly emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month

COMPLIANCE STATUS:

- a.) *COMPLIANCE. They are tracking each HAP containing material used.*
- b.) *COMPLIANCE. They are tracking VOC credits for liquid waste, in gallons and lbs. I was unclear on if these are HAP containing materials that are being reclaimed. I asked the company about this by email on 9/25/2020. On 9/30, Mr. Kinsler responded by email with the following answer, which indicates they are meeting the permit requirement: "The materials being reclaimed are the quantities in individual shipments and total pounds shown on the "VOC Credits" spreadsheet."*
- c.) *COMPLIANCE. They are tracking this in their Materials Details VOC and HAP spreadsheet.*
- d.) *COMPLIANCE. They are tracking HAP emissions in lbs per calendar month which can easily be converted to tons.*
- e.) *COMPLIANCE. They are tracking aggregate HAP emissions in tons per 12-month rolling time period, as required. They are tracking individual HAPs on a monthly basis, although not on a 12-month rolling basis. AQD requested by email on 9/25/2020 that this be added to their spreadsheet, if it is not already included. On 9/30, Mr. Kinsler responded by email, with an attached spreadsheet titled, New Emission Tracker.xlsx. He stated, "Please see revised Emission Tracker work book. The "Facility-Wide HAP Emissions" spreadsheet has been modified to speciate the individual Haps with rolling 12 months totals, along with the total HAPS with 12 month total." Based on this, Ground Effects is meeting this permit*

requirement.

SC VII. REPORTING:

NA

SC VIII. STACK/VENT RESTRICTIONS:

NA

SC IX. OTHER REQUIREMENT(S):

NA.

Miscellaneous:

There was an unused solvent recycling process stored onsite. I was told that it has not been used in 3 years, and they have no plans to relocate it to the new site, SRN P1122, on Van Slyke Road.

Departure:

I left the site at 2:21 PM.

Conclusion:

No instances of noncompliance were observed. Housekeeping was very well done at this facility.

Note: The above facility will be relocated to a site on Van Slyke Road, Flint, under opt-out PTI No. 63-20, which was approved on 9/9/2020. The new facility will have the SRN P1122. The stated date for start of operations is 1/4/2021.

NAME Daniel W. Moore

DATE 9/30/2020

SUPERVISOR

B.M.