

# Flint Assembly – New Paint Shop OPERATION AND MAINTENANCE PLAN

## Scope

The scope of this Operation and Maintenance (O&M) Plan applies to all six (6) regenerative thermal oxidizers (RTOs) in the new paint shop.

1. Alliance ELPO RTO #1 abates volatile organic compounds (VOCs) from the ELPO tank and the first portion (heat-up section) of the ELPO oven.
2. Alliance ELPO RTO #2 abates VOCs from the second portion (cure section) of the ELPO oven.
3. Alliance Sealer RTO abates VOCs from all zones of the Sealer oven.
4. Durr Booth RTO abates VOCs from prime ambient flash zones, basecoat heated flash zones, and clearcoat spray zones (including observation zone).
5. Alliance Topcoat Oven RTO1 abates VOCs from Topcoat oven 100 & 200.
6. Alliance Topcoat Oven RTO2 abates VOCs from Topcoat oven 300 & 400.

## General Requirements

According to Renewable Operating Permit (ROP) MI-ROP-B1606-2020, Appendix 3-1, all regenerative thermal oxidizer (RTO) maintenance inspections including the dates, results of the inspections and the dates and reasons for the repairs if made shall remain on file in the paint shop and/or with the environmental engineer as required by ILM retention period ENV016.

## Regenerative Thermal Oxidizers

1. Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
2. Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months\*.
3. Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months\*.

*\* The requirement to address this issue is satisfied if a performance test (i.e., stack test) has been performed on the control device within the prior 18-month period, or if the inspection is performed according to an alternative schedule, approved by the AQD District Office.*

## MAXIMO Tasks

All maintenance tasks required for the RTO are in MAXIMO.

	PM Description	PM Number	Frequency
1	Visual Inspection Heat Transfer Media	PM42320 – Booth RTO PM43606 – TC 1 RTO (Ovens 100 & 200) PM43607 – TC 2 RTO (Ovens 300 & 400) PM43608 – ED Oven / Tank RTO 1 PM43609 – ED Oven RTO 2 PM43610 – Sealer Oven RTO	Cannot exceed 18-months
2	Inspect Valve Seals, Verify Valve Timing/Synchronization	PM43739 – Booth RTO PM43740 – TC 1 RTO (Ovens 100 & 200) PM43741 – TC 2 RTO (Ovens 300 & 400) PM43742 – ED Oven / Tank RTO 1 PM43743 – ED Oven RTO 2 PM43744 – Sealer Oven RTO	Cannot exceed 18-months
3	Thermocouple Validation or Replacement	PM42319 – Booth RTO PM43601 – TC 1 RTO (Ovens 100 & 200) PM43602 – TC2 RTO (Ovens 300 & 400) PM43603 – ED Oven / Tank RTO 1 PM43604 – ED Oven RTO 2 PM43605 – Sealer Oven RTO	Cannot exceed 12-months

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