



State of Ohio Environmental Protection Agency

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CERTIFIED MAIL # 7006 2760 0001 2070 6624

February 9, 2007

Mr. Mike Sarver, Environmental Specialist
TS Trim Industries
59 Gender Road
Canal Winchester, OH 43110

RE: Notice of Violation resulting from compliance inspection on December 19, 2006 and uncorrected exceedances of the Title V permit reported to Ohio EPA on January 31, 2007

Dear Mr. Sarver:

The Central District Office (CDO), Division of Air Pollution Control (DAPC), appreciates the courtesy and cooperation extended by Mr. Andrew Shroads and you during the December 19, 2006 evaluation of your facility. The purpose of this evaluation is to assure compliance with applicable permits, as well as state and federal rules and regulations. Evaluation of the individual emissions units are summarized in the attached Emission Unit Evaluation Forms. Findings and any action items are summarized below.

Summary of Violations from December 19, 2006 Compliance Evaluation site visit:

Findings: TS Trim submitted an Intent to Test (ITT) Notification dated November 21, 2006 for a proposed test date of December 19, 2006 for demonstrating compliance with Testing Requirements in Section V.1.a for the adhesive spray booth (AV-1) emission unit R019. The emissions testing was required to demonstrate 90% overall destruction efficiency and to be conducted within 6 months prior to Title V permit expiration on January 9, 2007. TS Trim failed to conduct the emission testing and proposed to delay testing until a replacement device could be installed. TS Trim failed to comply with the Title V permit requirement.

Violations: TS Trim violated the Ohio Revised Code (ORC) 3704.05(c) for violating the terms and conditions of a permit-to-install (PTI) and/or Title V operating permit. Be advised, ORC rule 3704.05(c) states:

"No person who is a holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."

Action: Please submit an ITT to conduct emission testing prior to the effective date for the Surface Coating of Plastic Parts and Products MACT of April 19, 2007, to ensure compliance with the Title V permit and 40 CFR Part 63.4483(a)(2)(b).

Summary of Uncorrected Title V Permit Exceedances reported on January 31, 2007:

Findings: TS Trim submitted to the Ohio EPA CDO, a Fourth Quarter 2006 Deviation Report and 2006 Semi-Annual report for the period between July 1 to December 31, 2006 on January 31, 2007. TS Trim reported the following excursions:

1. TS Trim continued to operate during 12 time intervals of longer than 1 hour, during which the thermal oxidizer temperature was less than 50 degrees Fahrenheit below that temperature at which TS Trim demonstrated compliance, and also during 5 time intervals of 3-hours or more, during which the thermal oxidizer temperature was not documented.
2. TS Trim reported daily excursions of 15-minute time intervals or longer, in which the differential pressure was less than 0.004 inches of water, between the inside and outside of the permanent total enclosure.
3. TS Trim identified and continued to use a non-compliant coating between July 1 and September 30 2006, identified as a 1920 adhesive coating, that exceeded the organic compound (OC) content restriction of 5.6 lbs OC/gallon for emissions unit R019, as established in PTI -1-06663 and the Title V permit.

Violations: TS Trim violated Ohio Revised Code (ORC) 3704.05(c) for violating the terms and conditions of a PTI and/or Title V operating permit. Be advised, ORC rule 3704.05(c) states:

"No person who is a holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."

Action: Please submit a compliance plan and schedule outlining an action plan to repair or install an effective capture and control system with appropriate monitoring equipment that will return TS Trim to compliance with the terms and conditions of PTI 01-06663 and the Title V permit.

Mr. Mike Sarver,
TS Trim Industries
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Actions for Remedy:

1. Please submit an ITT to conduct emission testing that will demonstrate effective OC and HAP capture and control with a completed report to be submitted prior to April 19, 2007.
2. Please submit a compliance plan and schedule outlining an action plan to repair or replace the OC and HAP capture and control system including functioning monitoring equipment to ensure compliance with the terms and conditions of PTI 01-06663 and the Title V permit.

Please note that Ohio EPA has the authority to seek civil penalties as provided in the Ohio Revised Code (ORC) Section 3704.06. Submittal of the compliance plans, schedules, and reports does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC section 3704.06. The determination to pursue or decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

Please submit all of the requested information within thirty (30) days of receipt of this letter. If you have any questions concerning the issues addressed in this letter, you may contact John Kirwin of my staff at (614) 995-0673.

Sincerely,



Kelly Toth
Air Permits and Compliance Supervisor
Division of Air Pollution Control
Central District Office

Enclosures: Compliance Evaluation Forms

c: Andrew D. Shroads, Environmental Project Manager, August Mack Environmental
Isaac Robinson, Manager, Ohio EPA, DAPC/CDO
John Paulian, Ohio EPA, DAPC/CO

Evaluator(s): John Kirwin
 PCE Date(s): 12/19/2006 Arrival time: 02:00 Departure time: 5:00 Announced? Yes No
 Arrival time: _____ Departure time: _____ Announced? Yes No
 Arrival time: _____ Departure time: _____ Announced? Yes No
 FCE Date: 02/9/2007

OHIO EPA - CDO: Facility Evaluation Form

Facility Information:

Facility Name: TS Trim Facility ID: 0125031840
 Facility Address: 59 Gender Rd. Facility County: Franklin
 Facility City: Canal Winchester Phone Number: 614-837-4114
 Facility Zip Code: 43110
 Facility Contact(s): Mike Sarver Title(s): Environmental Contact
 other representative(s): Andrew Shroads Title(s): Consultants - August-Mack

Facility Classification:

Facility Type: (circle all that apply) MegaTV *Title V* Syn M FESOP Non-HP
 Applicable Programs: (circle) PSD NESHAP NSPS MACT
 Pollutant(s) regulated at facility: *OC/VOC*
HAP(s)

Facility Evaluation:

Fee reports submitted? Yes No (Due April 15 of preceding year for HP facilities)
 TV Compliance Cert (if applicable): Submitted? Yes No
 Compliant? Cont Int Comply No Pending
 Has there been enforcement against company in past 10 years? Yes No
 If yes, what units? P007, R019, R020, R021, R024, and R025
 Did facility comply with facility-wide operational, record keeping & reporting requirements? Yes No N/A

Notes: TS Trim reported significant deviations of TO bed temperature and pressure drop across the permanent total enclosure (PTE) operational restrictions in October 31, 2006 quarterly deviation report. TS Trim failed to conduct emission testing at least 6 months prior to expiration of Title V Permit in January 2007. TS Trim submitted an Intent to Test (ITT) on November 21 for emission testing on December 19, 2006 that proposed to use Method 25a to demonstrate 90% overall capture and destruction efficiency requirement for the (PTE) and thermal oxidizer (TO) in PTI 01-6663 and the Title V permit. TS Trim reported annual emissions of 15.0 tons OC, 17.0 tons, and 13.56 tons OC during 2004, 2005 and 2006 respectively. Andrew Shroads of August Mack recommended that TS Trim defer the emission test following DURR inspection of TO that concluded a maximum useful life of one year. During inspection, CDO staff reviewed the roll strip chart of TO temperature during November 2006 with TS

Trim for excursions the data indicated compliance for the 30 day period. In addition, CDO staff reviewed MSDS sheets for new adhesive formulations that August Mack proposed to submit for a modification request to allow TS Trim to become synthetic minor under terms in PTI 01-6663 to avoid Title V and MACT requirement. TS Trim no longer operates Kime Komi spray booth (R028) as permitted in PTI 01-06897 (1/7/98) and removed spray booth CC-1 identified as emissions unit R024 in the summer 2005.

FCE Summary on back...
Full Compliance Evaluation (FCE) Summary

(To be completed when FCE is finished)

Based on PCE and FCE evaluation findings, does it appear that the facility is in compliance with applicable requirements?

Yes

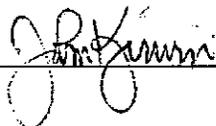
No If no, were non-compliant issues discussed with the permittee?

Yes

No (list issues not discussed)

Memo: TS Trim failed to demonstrate compliance with the VOC destruction efficiency requirement across the thermal oxidizer within 6 month prior to permit expiration as required in the Title V permit. TS Trim is proposing to replace the thermal oxidizer and proposed to delay testing until installation of the new thermal oxidizer.

Inspector(s) Signature: _____



Date: 2/09/07

Reviewer Signature: _____

Date: _____

Points to Remember:

- A full compliance evaluation (FCE) has been completed when all non-insignificant units have been fully evaluated at Title V facilities or all non-registration units have been fully evaluated at non-Title V facilities.
- A follow-up letter is required for all FCEs and for all PCEs during which serious violations were discovered. The follow-up letter should identify all non-compliance situations and cite all applicable rules and regulations which have been violated. The follow-up letter(s) should be attached to this evaluation form.
- Each permit that is needed to fully evaluate an emissions unit is considered part of the evaluation form and should be returned to the appropriate file folder when the evaluation is complete. It may be helpful to attach a copy of the permit(s) to this evaluation form.
- When entering data into CETA be aware that **Bold** section titles directly correspond to rows on CETA's Compliance Monitoring page. If there are any questions when entering the data, feel free to contact Isaac or Adam.
- VE observations need to be taken for any unit that is subject to a VE limitation per OAC rule 3745-17-07, 3745-31(BAT) or NSPS. The minimum amount of time to take a VE reading is 13 minutes. When no VE reading was taken during a PCE indicate the reason why VE's were not conducted at the time of inspection and estimate when VE's will be taken in the future to confirm compliance with the applicable requirement.

Possible reasons not to take a VE during a site visit are:

- 1 weather prohibited readings at the time of the inspection (follow up readings are necessary)
- 2 lack of daylight prohibited readings during time of inspection (follow up readings are necessary)
- 3 not enough time (follow up readings are necessary)
- 4 inspector not certified to read Method 9 (follow up readings are necessary)
- 5 unit not operating (follow up readings are necessary)
- 6 EU located in area of fac. where building or other obstructions prohibit proper positioning for Method 9
- 7 inherently clean emissions unit

Evaluator: John Kirwin
PCE Date(s): December 19, 2006

Premise #: 0125031840
Facility Name: TS Trim Industries

OHIO EPA - CDO: Emission Unit Evaluation Form

Emission Unit ID #: R019

Description: Adhesive booth AV-1 consisting of 4 back draft booths with 2 nozzles each followed by flashoff ovens

Emission Unit Permit(s):

Proper Permits Issued:

Installation Date: August 3, 1993 PTI #: 01-06663 Issue Date: 4/9/97
Type of permit(s)* (circle all that apply): Title V SM PSD FESOP PTO
List regulated pollutant(s): VOC
Memo: Title V permit issued 1/09/02 expires 1/09/07

* If installation or operating permit has not issued final, then explain status in the Memo.

Emission Unit Report(s):

CEM/COM: Were all CEM/COM reports submitted? Yes No Unkn N/A
Did the CEM/COM reports indicate compliance with permit limit(s)? Yes No Unkn N/A
Memo: _____

Deviation Reports: Were all deviation reports submitted? Yes No Unkn N/A
Did reports indicate non-compliance with permit limitations? Yes No Unkn
Memo: Deviation reports show that there are ongoing temperature exceedances and problems with the data logger for PTE and TO.

EU Specific Reports: Were all reports submitted? Yes No Unkn N/A
Did reports indicate non-compliance with permit limitations? Yes No Unkn
Memo: _____

Other Reports: Were all reports submitted? Yes No Unkn N/A
Did reports indicate non-compliance with permit limitations? Yes No Unkn
Memo: Annual emission reports indicated compliance.

Emission Unit Evaluation Findings:

VE observed:

Were VE observations taken in accordance with Method 9 or Method 22?

Yes (Data Attached) No Unkn N/A

If no, why not? (see Facility Inspection Form for reasons and further explanation)

Memo: Adhesive spray booths vent through filters and carbon bed concentrators.

Review of operational logs & usage records:

Were operational logs and/or usage records maintained in accordance with applicable permit(s)?

Yes No Not reviewed Unkn N/A

Memo: Daily Inventory

Observed actual operating parameters:

Was unit operating at time of inspection? Yes No Unkn

If no, when did it last operate? 3 of 4 booths in operation _____

Operating parameters observed at time of inspection: Walk through observed 4 back draft spray booths with ovens that employ 1077CT (5.35 lbs VOC/gallon) in #1, 1920 GF (5.68 lbs VOC/gallon) in #3, and 1920(5.5 lbsVOC/gallon) in #4. Booth #2 not in operation. Reviewed MSDS sheets for HAP and VOC content.

Was emission unit operating in compliance with permit T&Cs? Yes No Unkn N/A

Has equipment been changed, altered, or replaced since last permit app? Yes No Unkn

If yes, explain. Initially one enclosed booth with conveying line to flashoff booth replaced with open backdraft booths.

Have any operating parameters or raw materials been changed/altered since last permit app? Yes No Unkn

If yes, explain. New adhesives with different solvent formulations. _____

Memo: _____

Control equipment parameters assessed:

Description of air pollution control equipment (APCE): Permanent total enclosure vented to carbon concentrator and thermal oxidizer.

Was APCE operating at time of inspection? Yes No

Operating parameters observed at time of inspection: Reviewed monthly strip chart for temperature on thermal oxidizer, pressure differential on enclosure, and NMOC on carbon bed _____

Was APCE operating in compliance with permit T&Cs? Yes No Unkn N/A

Were maintenance records for APCE reviewed during inspection? Yes No Unkn

If yes, when was most recent significant maintenance? Likely October 2006 during DURR inspection of thermal oxidizer and carbon bed absorbers. Estimated that the maximum life at 1 years because of loss of structural support during operating life.

Does the level and frequency of maintenance appear adequate? Yes No Unkn TS Trim experiencing ongoing problems with the datalogger and temperature in the thermal oxidizer (TO) bed. TS Trim is evaluating type of and location of replacement TO. Repair of current device would require a facility shutdown for several days.

Has a Compliance Assurance Monitoring (CAM) plan been submitted for this APCE?

Yes No Unkn N/A

If yes, is the permittee following the CAM plan? Yes No Unkn

Memo: _____

Did any permit (PTI, TV,PTO) require performance testing for this unit? Yes No N/A

If yes, what pollutant(s)? Demonstrate compliance with PTE requirements and destruction efficiency across the thermal oxidizer.

If yes, was testing performed in accordance with the applicable permit? Yes No

Memo: Air flow and inlet VOC concentration reduced, current inlet VOC concentration less than design for TO.

Was CEM data reviewed during the inspection? Yes No Unkn N/A

If yes, which pollutants? _____

If yes, was unit in compliance with applicable requirements? Yes No Unkn N/A

Memo: _____

Evaluator: John Kirwin
PCE Date(s): December 19, 2006

Premise #: 0125031840
Facility Name: TS Trim Industries

OHIO EPA - CDO: Emission Unit Evaluation Form

Emission Unit ID #: R020

Description: Adhesive booth AF-1 (sep front) back draft booth with
2 nozzles followed by flashoff oven

Emission Unit Permit(s):

Proper Permits Issued:

Installation Date: August 3, 1993 PTI #: 01-06663 Issue Date: 4/9/97
Type of permit(s)* (circle all that apply): Title V SM PSD FESOP PTO
List regulated pollutant(s): VOC and HAPs
Memo: Title V permit issued 1/09/02 expires 1/09/07
* If installation or operating permit has not issued final, then explain status in the Memo.

Emission Unit Report(s):

CEM/COM: Were all CEM/COM reports submitted? Yes No Unkn N/A
Did the CEM/COM reports indicate compliance with permit limit(s)? Yes No Unkn N/A
Memo: _____

Deviation Reports: Were all deviation reports submitted? Yes No Unkn N/A
Did reports indicate non-compliance with permit limitations? Yes No Unkn
Memo: Deviation reports show that there are ongoing problems with the data logger for PTE and TO.

EU Specific Reports: Were all reports submitted? Yes No Unkn N/A
Did reports indicate non-compliance with permit limitations? Yes No Unkn
Memo: _____

Other Reports: Were all reports submitted? Yes No Unkn N/A
Did reports indicate non-compliance with permit limitations? Yes No Unkn
Memo: Annual VOC emission report, compliance certification, Title V fee emission reports and MACT applicability report.

Emission Unit Evaluation Findings:

VE observed:
Were VE observations taken in accordance with Method 9 or Method 22?
 Yes (Data Attached) No Unkn N/A
If no, why not? (see Facility Inspection Form for reasons and further explanation)
Memo: Adhesive spray booth vent through filter and carbon bed concentrators.

Review of operational logs & usage records:
Were operational logs and/or usage records maintained in accordance with applicable permit(s)?
 Yes No Not reviewed Unkn N/A

Memo: Daily Inventory

Observed actual operating parameters:

Was unit operating at time of inspection? Yes No Unkn

If no, when did it last operate? Two operators at booth, with 55 gallon drum on electronic scale.

Operating parameters observed at time of inspection: Walk through observed back draft spray booth that employs 1923B (5.5 lbsVOC/gallon). Reviewed MSDS sheets for HAP and VOC content.

Was emission unit operating in compliance with permit T&Cs? Yes No Unkn N/A

Has equipment been changed, altered, or replaced since last permit app? Yes No Unkn

If yes, explain. Employ belt to convey parts through curing oven.

Have any operating parameters or raw materials been changed/altered since last permit app? Yes No Unkn

If yes, explain. Employ different formulation adhesives.

Memo: _____

Control equipment parameters assessed:

Description of air pollution control equipment (APCE): Rotating carbon concentrator vented to thermal oxidizer.

Was APCE operating at time of inspection? Yes No

Operating parameters observed at time of inspection: Reviewed monthly strip chart for temperature on thermal oxidizer, pressure differential on enclosure, and NMOC on carbon bed

Was APCE operating in compliance with permit T&Cs? Yes No Unkn N/A

Were maintenance records for APCE reviewed during inspection? Yes No Unkn

If yes, when was most recent significant maintenance? DURR inspected thermal oxidizer and carbon bed adsorbers in October. Estimated that the maximum life at 1 years because of loss of structural support during operating life.

Does the level and frequency of maintenance appear adequate? Yes No Unkn TS Trim is evaluating type of and location of replacement.

Has a Compliance Assurance Monitoring (CAM) plan been submitted for this APCE?

Yes No Unkn N/A

If yes, is the permittee following the CAM plan? Yes No Unkn

Memo: _____

Did any permit (PTI, TV, PTO) require performance testing for this unit? Yes No N/A

If yes, what pollutant(s)? VOC destruction efficiency.

If yes, was testing performed in accordance with the applicable permit? Yes No

Memo: Air flow and inlet VOC concentration reduced, resulting in inlet VOC concentration less than design for TO. TS Trim requested to delay testing until the thermal oxidizer is replaced.

Was CEM data reviewed during the inspection? Yes No Unkn N/A

If yes, which pollutants? _____

If yes, was unit in compliance with applicable requirements? Yes No Unkn N/A

Memo: _____

Evaluator: John Kirwin
PCE Date(s): December 19, 2006

Premise #: 0125031840
Facility Name: TS Trim Industries

OHIO EPA - CDO: Emission Unit Evaluation Form

Emission Unit ID #: R021

Description: Adhesive booth AF-2 (SEP rear) consisting of back draft booth with 2 nozzles followed by flashoff oven

Emission Unit Permit(s):

Proper Permits Issued:

Installation Date: August 3, 1993 PTI #: 01-06663 Issue Date: 4/9/97
Type of permit(s)* (circle all that apply): Title V SM PSD FESOP PTO
List regulated pollutant(s): VOC
Memo: Title V permit issued 1/09/02 expires 1/09/07
* If installation or operating permit has not issued final, then explain status in the Memo.

Emission Unit Report(s):

CEM/COM: Were all CEM/COM reports submitted? Yes No Unkn N/A
Did the CEM/COM reports indicate compliance with permit limit(s)? Yes No Unkn N/A
Memo: _____

Deviation Reports: Were all deviation reports submitted? Yes No Unkn N/A
Did reports indicate non-compliance with permit limitations? Yes No Unkn
Memo: Deviation reports show that there are ongoing problems with the data logger for PTE and TO.

EU Specific Reports: Were all reports submitted? Yes No Unkn N/A
Did reports indicate non-compliance with permit limitations? Yes No Unkn
Memo: _____

Other Reports: Were all reports submitted? Yes No Unkn N/A
Did reports indicate non-compliance with permit limitations? Yes No Unkn
Memo: Annual VOC emission report, compliance certification, Title V fee emission reports and MACT applicability report

Emission Unit Evaluation Findings:

VE observed:

Were VE observations taken in accordance with Method 9 or Method 22?
 Yes (Data Attached) No Unkn N/A
If no, why not? (see Facility Inspection Form for reasons and further explanation)
Memo: Adhesive spray booth vents through filter and carbon bed concentrators.

Review of operational logs & usage records:

Were operational logs and/or usage records maintained in accordance with applicable permit(s)?
 Yes No Not reviewed Unkn N/A

Memo: Inventory and daily usage log

Observed actual operating parameters:

Was unit operating at time of inspection? Yes No Unkn

If no, when did it last operate? Two operators at booth, with 15 gallon spray pot.

Operating parameters observed at time of inspection: Walk through observed back draft spray booth that employs 1923B (5.5 lbsVOC/gallon). Reviewed MSDS sheets for HAP and VOC content.

Was emission unit operating in compliance with permit T&Cs? Yes No Unkn N/A

Has equipment been changed, altered, or replaced since last permit app? Yes No Unkn

If yes, explain. New formulation of adhesive.

Have any operating parameters or raw materials been changed/altered since last permit app? Yes No Unkn

If yes, explain. New adhesives.

Memo: _____

Control equipment parameters assessed:

Description of air pollution control equipment (APCE):

Was APCE operating at time of inspection? Yes No

Operating parameters observed at time of inspection: Reviewed monthly strip chart for temperature on thermal oxidizer, pressure differential on enclosure, and NMOC on carbon bed

Was APCE operating in compliance with permit T&Cs? Yes No Unkn N/A

Were maintenance records for APCE reviewed during inspection? Yes No Unkn

If yes, when was most recent significant maintenance? DURR inspected thermal oxidizer and carbon bed adsorbers in October. Estimated that the maximum life at 1 years because of loss of structural support during operating life.

Does the level and frequency of maintenance appear adequate? Yes No Unkn TS Trim is evaluating type of and location of replacement.

Has a Compliance Assurance Monitoring (CAM) plan been submitted for this APCE?

Yes No Unkn N/A

If yes, is the permittee following the CAM plan? Yes No Unkn

Memo: _____

Did any permit (PTI, TV, PTO) require performance testing for this unit? Yes No N/A

If yes, what pollutant(s)? VOC destruction efficiency at least 6 months prior to expiration.

If yes, was testing performed in accordance with the applicable permit? Yes No

Memo: Air flow and inlet VOC concentration reduced, resulting in inlet VOC concentration less than design for TO. TS Trim requested to delay testing until the thermal oxidizer is replaced.

Was CEM data reviewed during the inspection? Yes No Unkn N/A

If yes, which pollutants? _____

If yes, was unit in compliance with applicable requirements? Yes No Unkn N/A

Memo: _____

Evaluator: John Kirwin
PCE Date(s): December 19, 2006

Premise #: 0125031840
Facility Name: TS Trim Industries

OHIO EPA - CDO: Emission Unit Evaluation Form

Emission Unit ID #: R025

Description: Adhesive booth AF-3 consisting of back draft booth with 2 nozzles followed by flashoff oven

Emission Unit Permit(s):

Proper Permits Issued:

Installation Date: August 3, 1993 PTI #: 01-06663 Issue Date: 4/9/97
Type of permit(s)* (circle all that apply): Title V SM PSD FESOP PTO
List regulated pollutant(s): VOC
Memo: Title V permit issued 1/09/02 expires 1/09/07
* If installation or operating permit has not issued final, then explain status in the Memo.

Emission Unit Report(s):

CEM/COM: Were all CEM/COM reports submitted? Yes No Unkn N/A
Did the CEM/COM reports indicate compliance with permit limit(s)? Yes No Unkn N/A
Memo: _____

Deviation Reports: Were all deviation reports submitted? Yes No Unkn N/A
Did reports indicate non-compliance with permit limitations? Yes No Unkn
Memo: Deviation reports show that there are ongoing problems with the data logger for PTE and TO.

EU Specific Reports: Were all reports submitted? Yes No Unkn N/A
Did reports indicate non-compliance with permit limitations? Yes No Unkn
Memo: _____

Other Reports: Were all reports submitted? Yes No Unkn N/A
Did reports indicate non-compliance with permit limitations? Yes No Unkn
Memo: Annual VOC emission report, compliance certification, Title V fee emission reports and MACT applicability report

Emission Unit Evaluation Findings:

VE observed:

Were VE observations taken in accordance with Method 9 or Method 22?
 Yes (Data Attached) No Unkn N/A
If no, why not? (see Facility Inspection Form for reasons and further explanation)
Memo: Adhesive spray booth vents through filter and carbon bed concentrators.

Review of operational logs & usage records:

Were operational logs and/or usage records maintained in accordance with applicable permit(s)?
 Yes No Not reviewed Unkn N/A

Memo: Inventory and daily usage log

Observed actual operating parameters:

Was unit operating at time of inspection? Yes No Unkn

If no, when did it last operate? 55 gallon drum on scale.

Operating parameters observed at time of inspection: Walk through observed back draft spray booth that employs 1923B (5.5 lbsVOC/gallon). Reviewed MSDS sheets for HAP and VOC content.

Was emission unit operating in compliance with permit T&Cs? Yes No Unkn N/A

Has equipment been changed, altered, or replaced since last permit app? Yes No Unkn

If yes, explain.

Have any operating parameters or raw materials been changed/altered since last permit app? Yes No Unkn

If yes, explain. New formulation for adhesive.

Memo:

Control equipment parameters assessed:

Description of air pollution control equipment (APCE):

Was APCE operating at time of inspection? Yes No

Operating parameters observed at time of inspection: Reviewed monthly strip chart for November with bed temperature on thermal oxidizer, pressure differential on enclosure, and NMOC on carbon bed

Was APCE operating in compliance with permit T&Cs? Yes No Unkn N/A

Were maintenance records for APCE reviewed during inspection? Yes No Unkn

If yes, when was most recent significant maintenance? DURR inspected thermal oxidizer and carbon bed adsorbers in October. Estimated that the maximum life at 1 years because of loss of structural support during operating life.

Does the level and frequency of maintenance appear adequate? Yes No Unkn TS Trim is evaluating type of and location of replacement and ongoing problems with the datalogger and temperature in the TO bed.

Has a Compliance Assurance Monitoring (CAM) plan been submitted for this APCE?

Yes No Unkn N/A

If yes, is the permittee following the CAM plan? Yes No Unkn

Memo:

Did any permit (PTI, TV, PTO) require performance testing for this unit? Yes No N/A

If yes, what pollutant(s)? VOC destruction efficiency at least 6 months prior to expiration.

If yes, was testing performed in accordance with the applicable permit? Yes No

Memo: Air flow and inlet VOC concentration reduced, resulting in inlet VOC concentration less than design for TO. TS Trim requested to delay testing until the thermal oxidizer is replaced.

Was CEM data reviewed during the inspection? Yes No Unkn N/A

If yes, which pollutants?

If yes, was unit in compliance with applicable requirements? Yes No Unkn N/A

Memo: