DEPARTMENT OF ENVIRONMENT AND CONSERVATION
TENNESSEE DIVISION OF AIR POLLUTION CONTROL
ANNUAL INSPECTION

Facility No.: 01-0177
State Category: TM

Lead Inspector: SPB

Date Inspected: February 10, 2015

On-Site: __X__ **YES** _____ **NO**

Company Name: Powder Cote II
Location address: 193 Frank L. Diggs Lane
City/State/Zip: Clinton, TN 37716
Mailing Address, if different:

Responsible Official/Title: Charles Trott
Phone:(586) 634-2574
E-Mail Address: ctrott@powdercoteii.com

Facility Contact/Title: Charles Trott, President
Phone: (586) 634-2574
E-Mail Address: ctrott@powdercoteii.com

Date of the last annual inspection: Initial
Time period covered by this inspection, from: February 10, 2013 **to:** February 10, 2015
Is inspection partial or comprehensive? comprehensive

Total time required for this inspection (hours): 27.0

Was company in compliance during entire inspection time period? _____ **YES** __X__ **NO**
If NO, enter data below and explain violation(s) after table.

Violation(s) Description	NOV Date	Issued By (EFO, CV, Permitting)	EAR #
Failure to notify change in responsible official within 30 days, condition 8 log was not available at the time of the inspection for permit 062704P, conditions 8 and 9 logs were not available for inspection for permit 062705P.	3/30/15	EFO	16535

Comments: On 3/12/15 the facility submitted the responsible official change notice, and on 3/25/15 the company submitted complete logs. A review of this information was made and the facility has returned to compliance.

Current Compliance Status: __X__ **IN** _____ **OUT**
If OUT, provide explanation.

Comments: N/A

Description of Facility Operations: Powder Cote II operates one dip tank, cure oven, and powder coating cure oven at each site (193 and 185 Frank L. Diggs Lane in Clinton, TN). The two sites are next door to each other. The site at 185 Frank L. Diggs Lane also has a dry off oven to dry parts prior to powder coating. Operating permit 062704P is 193 and operating permit 062705P is 185.

Review Status of Required Reports:
Include all reports reviewed since last AI report

Report Type (SAR, ACC, MACT, CM)	Timeframe Report Covers	Due Date	Received in CO	Received in EFO	Postmarked Date	Reviewed Date	Report Adequate (Y/N) if N, explain below	SL Report Tracking Number
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Comments: N/A

Visible Emissions Status/Evaluations:
All emission points observed and no visible emissions seen: ___X___**YES** _____**NO**

Source Number & Stack ID	Date of VEE	Limit/Method	Compliance Status (IN/OUT)
N/A	N/A	N/A	N/A

Comments about visible emissions observed if no VEE conducted: N/A

1) Permit Status:
For each permit used for this inspection, repeat items 1-5 to include details for each permit.

Permit Number	Source Number(s)	Issue/Amendment/Modification Date	Expiration Date	Renewal Due Date	Renewal Received Date
062704P	01	March 30, 2009	January 1, 2019	November 2, 2018	N/A

Comments: N/A

2) Mass Emission Limits:

Source Number	Permit Condition	Condition Limit	Maximum During Review Period
01	2	VOC's excluding water emitted ≤ 2.65 tons per 12 consecutive months.	No required compliance method is given in the permit, but records submitted the highest 12 month total ended on January 2015 at 1.67 tons or 3,324 lbs.

Comments: N/A

3) Process Parameters (feed rates, input limits, work practice standards, etc.):

Source Number	Permit Condition	Condition Limit	Maximum During Review Period
01	3	MSDS must be available for inspection	This information is retained onsite.

Comments: N/A

4) Control Equipment Operating Parameters (flow rates, pressure drop, temperature, etc.):

Source Number	Permit Condition	Condition Limit	Value During On-Site Inspection	Compliance Maintained (Yes/No)
N/A	N/A	N/A	N/A	N/A

Comments: N/A

5) On-Site Review of Facility Records and Operating Logs:

Source Number	Permit Condition	Type of Record/Log	Available (Yes/No)	Review Time Frame	Compliance (Yes/No)
01	5	VOC content	No	2/10/13-2/10/15	No

Comments: Condition 2 does not require records for VOC emissions, but those are being maintained and were reviewed. VOC content records were not readily available for inspection, but were submitted in the required format for inspection on 3/25/15.

1) Permit Status:

For each permit used for this inspection, repeat items 1-5 to include details for each permit.

Permit Number	Source Number(s)	Issue/Amendment/Modification Date	Expiration Date	Renewal Due Date	Renewal Received Date
062705P	03	March 30, 2009	January 1, 2019	November 2, 2018	N/A

Comments: N/A

2) Mass Emission Limits:

Source Number	Permit Condition	Condition Limit	Maximum During Review Period
03	2	PM emitted $\leq$ 0.77 lbs/hr.	Company utilizes robotic spray and regular maintenance of the filter system is performed. This was verbally confirmed with Chris Hunsucker at the plant and visually observed during the inspection.
03	3	SO2 emitted $\leq$ 1 lb/hr.	There is no compliance method for this condition.
03	5	VOC's emitted $\leq$ 33.67 tons per 12 consecutive months.	2.85 tons per 12 consecutive months ending December

			2014.
03	5	HAP's emitted ≤ 9.9 tons (individual) and 24.9 tons (combined) per 12 consecutive months.	This facility does not emit HAP's per Mr. Trott.

Comments: N/A

3) Process Parameters (feed rates, input limits, work practice standards, etc.):

Source Number	Permit Condition	Condition Limit	Maximum During Review Period
03	4	Only natural gas or propane shall be used as fuel.	This was verbally confirmed during the inspection.
03	5	Spray booths shall not exceed 4.33 pounds of VOC per gallon of coating as applied	The highest VOC content found from the review of records in any material was 0.62 lbs/gal.
03	5	Dip tanks shall not exceed 0.55 pounds of VOC per gallon of coating as applied.	The highest VOC content found from the review of records in any material was 0.62 lbs/gal.
03	5	Facility shall start implementation of a closed container policy and operator training specifically related to minimizing emissions.	This was verbally confirmed during the inspection.
03	5	Facility shall use robotic spray where possible and collection of clean-up solvents and wiping rags for appropriate disposal.	This was verbally confirmed during the inspection.
03	8	MSDS must be available for inspection	This information is retained onsite.

Comments: N/A

4) Control Equipment Operating Parameters (flow rates, pressure drop, temperature, etc.):

Source Number	Permit Condition	Condition Limit	Value During On-Site Inspection	Compliance Maintained (Yes/No)
N/A	N/A	N/A	N/A	N/A

Comments: N/A

5) On-Site Review of Facility Records and Operating Logs:

Source Number	Permit Condition	Type of Record/Log	Available (Yes/No)	Review Time Frame	Compliance (Yes/No)
03	8	VOC content	No	2/10/13-2/10/15	Yes
03	9	VOC/HAP emission	No	2/10/13-2/10/15	Yes

Comments: Records were not readily available for inspection, but were submitted in the required format for inspection on 3/25/15.

Additional Information:

A copy of the Department's *Mercury-Added Product Disposal Requirements* was given to the facility for review: ___X___YES _____NO

Was any complaint received? _____YES ___X___NO
If YES, provide comments:

Has open burning occurred at this facility? _____YES ___X___NO
If YES, provide comments:

Was any stack testing required? _____YES ___X___NO
If YES, provide comments:

Was any stack testing performed? _____YES ___X___NO
Comments:

Was there any air-related construction/modification? _____YES ___X___NO
If YES, provide comments:

Is any air-related construction/modification planned? _____YES ___X___NO
If YES, provide comments:

Are there any unpermitted and/or exempt sources (e.g., generators, stationary engines, boilers) that need further attention? _____YES ___X___NO
If YES, provide comments:

Sam Barnett — Lead Inspector's Name

4/2/15 — Date

VEE Certification Number: 2018
Certification Expiration Date: 3/19/15

I verify that the format and content of this report conforms to established TN Division of Air Pollution Control annual inspection standard operational procedures guidance and that the compliance determination made in this report is correct.

Martin L. Campbell — Supervisor/Manager

4-2-15 — Date