



SURFACE COATING OPERATIONS



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)
 RE-INSPECTION (FUI) ARMS COMPLAINT NO:

| | | | |
|---|-------------------------------|--------------------------------|--------------------------------|
| AIRS ID#: 0951331 | DATE: <u>3/30/2011</u> | ARRIVE: <u>10:30 AM</u> | DEPART: <u>11:00 AM</u> |
| FACILITY NAME: CHEP USA-ORLANDO PLANT | | | |
| FACILITY LOCATION: 7315 KINGSPONTE PKWY #200 ORLANDO 32819-6537 | | | |
| OWNER/AUTHORIZED REPRESENTATIVE: CHRISTOPHER YOUNG | | PHONE: (407)370-2437 | |
| Email: christopher.young@chep.com | | Mobile: | |
| CONTACT NAME: ANTHONY PALMER | | PHONE: (407)355-7002 | |
| Email: anthony.palmer@chep.com | | Mobile: | |
| ENTITLEMENT PERIOD: 3/26/2010 / 3/26/2015 (effective date) (end date) | | | |

PART I: INSPECTION COMPLIANCE STATUS (check only one box)

IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

PART II: RECORDKEEPING REQUIREMENTS – Rule 62-210.300, F.A.C.
(check appropriate box(es))

- Does the facility operate any emissions units other than the surface coating operations and emissions units which are exempt from permitting pursuant to the criteria of paragraph 62-210.300(3)(a) or (b), F.A.C., or have been exempted from permitting under Rule 62-4.040, F.A.C.? (Rule 62-210.300(3)(c)4.a., F.A.C.) Yes No
- Does the owner/operator of the facility maintain records to document the VOC content of the coatings and the quantity of the coatings used?----- Yes No
- Does the owner/operator retain, and make available for Department inspection, these records for a period of at least five years?----- Yes No
- Is the total quantity of VOC's in such coatings 44 lbs/day or less, averaged monthly?----- Yes No
- Does the amount of coatings used, include solvents and thinners used in the process including those used for cleanups?----- Yes No

PART III: CONTROL/OPERATING/MAINTANANCE REQUIREMENTS – Rule 62-210.300, F.A.C.
(check appropriate box(es))

- Is/Are the surface coating operation(s) subject to a VOC Reasonably Available Control Technology (RACT) emission limiting standard of Chapter 62-296.500, F.A.C.? (Rule 62-210.300(3)(c)4.b., F.A.C.)----- Yes No
- Does the facility cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor? (Rule 62.296.320(2), F.A.C.)----- Yes No

PART III: CONTROL/OPERATING/MAINTENANCE REQUIREMENTS – Rule 62-210.300, F.A.C. – (continued)

(check appropriate box(es))

3. Does the owner/operator encourage pollution prevention through such measures as training employees involved in surface coating operations on methods of reducing VOC emissions by:
- a) maintaining spray coating equipment to ensure effective application with a minimum of overspray? Yes No
 - b) monitoring the coating thickness to avoid excessive coating?----- Yes No
 - c) considering the use of low-VOC coatings (e.g., waterborne, ultra-violet cured, or powder coatings)? Yes No
 - d) implementing inventory control practices to prevent spillage?----- Yes No
 - e) implementing management practices to reduce VOC emissions during cleanup by:
 - 1. spraying light colored coatings before dark colored coatings to reduce the number of cleaning cycles?----- Yes No
 - 2) recycling cleaning solvents?----- Yes No
 - 3) using water based cleaners?----- Yes No

PART IV: SPECIAL CONDITIONS AND PROCEDURES – Rule 62-210.300, F.A.C.

A. New or Modified Process Equipment

1. Since the last inspection has there been
- a) installation of any new process equipment?----- Yes No
 - b) alterations to existing process equipment without replacement?----- Yes No
 - c) replacement of existing equipment substantially different than that noted on the most recent notification form?----- Yes No
 - d) If you answered **YES** to any of the above, did the owner submit a new and complete notification form and appropriate fee (Rule 62-4.050, F.A.C.) to the appropriate DEP or local program office?----- Yes No

Ilka Bundy

3/30/2011

Inspector's Name (Please Print)

Date of Inspection

3/30/2012

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: Ilka Bundy met with Rene' A. Urzua, Plant Supervisor, on March 30, 2011, to conduct the annual inspection for the surface coating facility. CHEP USA issues, collects, conditions and reissues more than 300 million pallets and containers from a global network of service centers. The Orlando plant collects, reconditions and reissues approximately 80,000 pallets a month. These pallets are painted with an automated painting system in a paint booth using a watered-down blue paint (4:1 dilution). A worker then sprays a watered-down white paint (4:1 dilution) with their logos on the side of the pallet using a stencil. The record-keeping requirements include the total quantity of volatile organic compounds (VOCs) in all coatings used shall not exceed 44 pounds per day, averaged monthly, where coatings used shall include solvents and thinners used in the process or for cleanup. The owner is required to maintain records to document the VOC content and the quantity of coatings used. The records are to be retained for a period of at least 5 years. The records provided by Mr. Urzua shows that the highest VOC usage was in September 2010 with 33 pounds per day, averaged monthly. The highest consecutive 12 month total was in January 2011 with 4.67 tons VOCs. The facility is currently looking into a new paint vendor due to a price increase in their current paint vendor. A facility walk-through was conducted with Mr. Urzua. The facility removed the white automated painting system for the stenciling operation. A very experienced painter now uses a spray gun and stencil to paint the logos on the pallet sides. Mr. Urzua stated that the person is faster and more effective than the automated system. The facility is in compliance with their air permit requirements at this time. No objectionable odors were detected and no unconfined or uncontrolled emissions were observed.