



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Henry R. Darwin
Director

Air Quality Field Inspection Report

Company Name: Fluoro-Seal International, L.P.	Inspection Report No.: 201582
Place Name: Fluoro-Seal International, L.P. Place ID No.: 17906	Inspector(s): Weiwen Daly
County: Yuma	Arrival Date and Time: 7/12/2013@1400
Physical Location: 7211 East 30 th Street, Ste. A City, State, Zip: Yuma, AZ 85365	Reason for Inspection: <input type="checkbox"/> Complaint Complaint No.: <input checked="" type="checkbox"/> Routine Inspection <input type="checkbox"/> Follow-Up Original Inspection Report No.:
Mailing Address: 16360 Park Ten Place, Suite 325 City, State, Zip: Houston, Texas, 77084	
Coordinates (for new locations): Latitude: Deg.: 32 Min.: 40 Sec.: 23.3530 Longitude: Deg.: 114 Min.: 30 Sec.: 32.7676	
Permit No.: 48314 Permit Expiration Date: 10/6/2014	Was Inspection Announced? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Onsite Contact Person(s)/Title(s): Tito Valenzuela/Plant Manager Frederick Nicholas/HSE Director	Operational Status: <input checked="" type="checkbox"/> Operating <input type="checkbox"/> Not Operating <input type="checkbox"/> Shutdown Upon Arrival
Other Names for Site/Facility:	Inspection Completion Date and Time: 7/12/2013@15:45
Results of Inspection: <input type="checkbox"/> No deficiencies were noted during the course of the inspection. No ADEQ action will result from this inspection. <input checked="" type="checkbox"/> Potential deficiencies were noted during the course of the inspection. Additional correspondence regarding this inspection may be forthcoming.	
Comments: Potential deficiencies identified during the pre-inspection file review include the following: <ul style="list-style-type: none"> - Failure to submit the annual compliance certifications for 2010, 2011, and 2012; and - Failure to submit the annual emission inventories for 2010, 2011, and 2012. Potential deficiency identified during the inspection include: failure to maintain a Leak Detection and Repair Procedure on site. On July 21, 2013, Frederick Nicholas, HSE Director of Fluoro-Seal corporate office in Houston Texas, submitted the annual compliance certifications and the annual emission inventories, as well as the Procedure for Leak Detection and Repair to ADEQ Air Quality Division. All the deficiencies identified during pre-inspection file review and field inspection have been corrected.	
Attachments: Attachment A – Notice of Inspection Rights Attachment B – Inspection Checklist Attachment C – Procedure for Leak Detection and Repair	

Pre-Inspection

Are fees paid? [Attachment A, Section V]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Annual Emissions Inventory submitted? [Attachment A, Section VI, Part A]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Emission inventories for 2010, 2011, and 2012 were not submitted.
Compliance Certifications submitted? [Attachment A, Section VII, Part A]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Compliance Certifications for 2010, 2011, and 2012 were not submitted.
Any Excess Emission/ Permit Deviation Reports submitted? [Attachment A, Section XI or XII, Part A]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Any recent NOV or NOC?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Last performance test and production rate	Date:	Production Rate:
Last Inspection	Date: 11/17/2009	
Any demolition or renovation performed since the issuance of the permit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	



**ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
NOTICE OF INSPECTION RIGHTS**

FACILITY INFORMATION	ADEQ INFORMATION
Facility Name (Customer): <u>Fluoro-Seal International LLC</u> Facility Location: <u>7211 E 30th St. Ste. A.</u> RP Mailing Address: <u>Yuma, AZ 85365</u> Responsible Party: <u>Fred Nickles, Safety Manager</u> Telephone: <u>(281) 578-1440</u> On-Site Representative: <u>Tito Valenzuela, Plant Manager</u> Telephone: <u>(928) 726-3315</u> Additional On-Site Contact Persons: _____ Telephone: _____	Date of Inspection: <u>7/12/13</u> County: <u>Yuma</u> Inspector: <u>Weiwen Daly</u> Telephone: <u>(520)628-6724</u> Accompanied by: _____ ADEQ Follow-up Contact: <u>Milena Sousa, ADEQ/SRO/CPU/AOCT</u> Title: <u>Regional Compliance Manager</u> Telephone: <u>(520) 770-3126</u>

The ADEQ representative(s) identified above were present at the above address on the above listed date and time. Upon entry to the premises, the ADEQ representative(s) met with me, presented photo identification indicating that they are ADEQ employees and explained:

That the purpose of the inspection is to determine:

Compliance with Title 49 of the Arizona Revised Statutes, Title 18 of the Arizona Administrative Code* and/or:

Arizona Revised Statutes: Title _____, Chapter _____, Article _____

Arizona Administrative Code: Title R, Chapter 18-2, Articles 3

Permit/Agreement Number: 48314

Qualification for a license issued pursuant to:

Arizona Revised Statutes: § _____

Arizona Administrative Code: R _____

That this inspection is conducted pursuant to the authority granted in Arizona Revised Statutes § 49-104(B)(8) and/or:

Arizona Revised Statutes: § _____

Arizona Administrative Code: R 18-2

Permit/Agreement Number: _____

That the fee for this inspection is: Included in permit fees.

*The Arizona Revised Statutes (A.R.S.) can be found on the internet at www.azleg.state.az.us/ars/ars.htm while the Arizona Administrative Code (A.A.C.) can be found at www.sosaz.com/public_services/Table_of_Contents.htm.

While I have the right to refuse to sign this form, the ADEQ representatives may still proceed with the inspection.

I have read both sides of this notice and discussed any questions or concerns with the ADEQ representatives.

TITO VALENZUELA
Signature of Regulated Person or Authorized On-Site Representative

7/12/13
Date

The regulated person or authorized on-site representative refused to sign.

Name of Regulated Person or Authorized On-Site Representative

Title

The regulated person or an authorized on-site representative was not present at the facility.

Weiwen Daly
Signature of ADEQ Representative - Weiwen Daly

7/12/13
Date

INSPECTION RIGHTS

I understand that I may accompany the ADEQ representative(s) on the premises, except during confidential interviews.

I understand that I have a right to:

- Copies of any original documents taken during the inspection, and that ADEQ will provide copies of those documents at ADEQ's expense.
- A split of any samples taken during the inspection, if the split of the samples would not prohibit an analysis from being conducted or render an analysis inconclusive.
- Copies of any analysis performed on samples taken during the inspection and that ADEQ will provide copies of this analysis at ADEQ's expense.

I also understand that:

- Each person interviewed during the inspection must be informed that statements made by the person may be included in the inspection report.
- Each person whose conversation is tape recorded during the inspection must be informed that the conversation is being tape recorded.
- If an administrative order is issued or a permit decision is made based on the results of the inspection, I have the right to appeal that administrative order or permit decision. I understand that my administrative hearing rights are set forth in Arizona Revised Statutes § 41-1092 *et seq.* and my rights relating to an appeal of a final agency decision are found in Arizona Revised Statutes § 12-901 *et seq.*
- If I have any questions or concerns about this inspection, I may contact the person listed as the ADEQ Follow-up Contact on the front of this form; or I may contact the Arizona Ombudsman-Citizens' Aid office at (602) 277-7292 or toll free at (800) 872-2879.
- If I have any questions concerning my rights to appeal an administrative order or permit decision, I may contact ADEQ's Office of Special Counsel at (602) 771-2212 or toll free inside Arizona at (800) 234-5677, extension 2212.

ATTACHMENT A. GENERAL PROVISIONS		
1	Permit or certificate of issuance posted; all equipment marked clearly with Equipment ID number, S/N or Permit number. Attachment "A", Sec. IV.A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2	Keep a full copy of the permit on site. Attachment "A", Sec. IV.B	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A A complete copy of the permit is maintained by the Plant Manager.
3	Comply with the provisions of 40 CFR Part 68 if the source becomes subject to these provisions according to the time line specified in 40 CFR Part 68. Attachment "A", Sec. XI	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
ATTACHMENT B. SPECIFIC CONDITIONS		
II. A QD EMISSIONS REQUIREMENTS		
4	<u>Permittee shall not allow the emissions of hydrogen fluoride to exceed 3 ppm by volume from Stack EP-1.</u> Attachment "B", Sec. II.A.1	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A The continuous hydrogen fluoride emissions monitor showed 0.3 ppm during the inspection.
5	Permittee shall implement and maintain a program for leak detection and repair for process piping and equipment in fluorine or hydrogen fluoride service. Record corrective actions taken to repair leaks and make available to the Department upon request. A copy of the leak detection program shall be made available to the Department upon request. Attachment "B", Sec. II.A.2	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A The Leak Detection and Repair Procedure was submitted to the inspector on July 23, 2013, by Fluoro-Seal's EHS Director. (See Attachment C)
6	Permittee shall operate and maintain all equipment identified in Attachment "C" in accordance with manufacturer's specifications, or operating practices which conform with good air pollution control practices. Attachment "B", Sec. II.A.3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
7	<u>Permittee shall install, operate, maintain and calibrate a continuous hydrogen fluoride emissions monitor on stack EP-1.</u> Attachment "B", Sec. II.B.1	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
8	Keep a log of all emissions related maintenance activities performed at the facility Attachment "B", Sec. II.B.2	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A The inspector reviewed the service log for the alumina scrubber system, and the fluorine cell maintenance log.
9	Submit reports of all monitoring activities required in Attachment "B" along with the annual compliance certifications required by Section VII of Attachment "A." Attachment "B", Sec. II.B.3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A The compliance certifications have been reviewed by the AQD Compliance Section and no deficiencies identified by the Permit Analyst.
III. FLUORINATION PROCESS		
10	Gaseous Emissions – Emissions Limitations: Permittee shall	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

	not emit gaseous or odorous materials from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution. Attachment "B", Sec. III.A.1	The inspector did not detect any odors during the inspection.
11	Materials including solvents, or other volatile compounds, paints, acids, alkalis, pesticides, fertilizers and manure shall be processed, stored, used and transported in such a manner and by such means that they will not evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices, or equipment shall be mandatory. Attachment "B", Sec. III.A.2	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
12	Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution is discharged to adjoining property, the Director may require the installation of abatement equipment or the alteration of such stack, vent, or other outlet by the owner or operator. Attach. B, Sec. III.A.3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
13	Permittee shall not cause, allow or permit visible emissions from Stack EP-1 in excess of 20 percent opacity. Attach. B, Sec. III.A.4	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A The inspector did not observe any visible emissions during the inspection.
14	Air Pollution Control Requirements. <i>At all times including periods of startup, shutdown, and malfunction, maintain and operate the alumina scrubber system to control hydrogen fluoride emissions in accordance with manufacturer's specifications and in a manner consistent with good air pollution control practice for minimizing emissions.</i> Attach. B, Sec. III.B	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A The inspector reviewed the service log for the alumina scrubber system which is done on a daily basis.
IV. FUGITIVE DUST REQUIREMENTS		
15	Particulate Matter & Opacity- Opacity of emissions from any fugitive dust non-point source $\leq 40\%$ measured in accordance with the Arizona Testing Manual, Reference Method 9. Attachment "B", Sec. IV.B.1.a.i	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A The facility is paved and no fugitive dust emissions were observed by the inspector.
16	Permittee shall not cause, allow or permit visible emissions from any fugitive dust point source $>20\%$ opacity. Attachment "B", Sec. IV.B.1.a.ii	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A The inspector did not observe any visible emissions during the inspection.
17	Dust Control - Permittee shall employ reasonable precautions or approved by Director, to prevent excessive amounts of particulate matter from becoming airborne. Attachment "B", Sec. IV.B.1.a.iii	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Fluoro-Seal provided the inspector a copy of the "Parking Lot Dust Cleaning Log".

18	Maintain records of the dates on which any of the activities listed in Conditions IV.B.a.iii.(a) through (h) were performed and the control measures that were adopted. Attachment "B", Sec. IV.B.1.b	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
19	Open Burning- No open burning except when permitted to do so. Attachment "B", Sec. IV.B.2.a	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
20	Permittee may comply with Condition IV.B.2.a above by maintaining copies of all open burning permits on file. Attachment "B", Sec. IV.B.2.b	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A No open burning activities at this facility.
V. OTHER PERIODIC ACTIVITY REQUIREMENTS		
A. Abrasive Blasting		
21	Use good modern practices, such as wet blasting, effective enclosures with dust collecting equipment, and any other approved methods when conducting sandblasting or other abrasive blasting operations. Attachment "B", Sec. V.A.1.a	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A No abrasive blasting activities at this facility.
22	Opacity not in excess of 20% from any sandblasting or other abrasive blasting operations (EPA Method 9). Attachment "B", Sec. V.A.1.b	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
23	Log in ink or in an electronic format, a record of the date, duration and types of control measures used for each such abrasive blasting project. Attachment "B", Sec. V.A.2	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
B. Use of Paints		
24	Other than architectural coating or spot painting, spray painting shall be conducted in an enclosed area equipped with controls containing no less than 96% of overspray. Architectural coatings may not employ photo chemically reactive solvents. Attachment "B", Sec. V.B.1.a	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A No painting activities at this facility.
25	Monitoring and Recordkeeping Requirements. Each time a spray painting project is conducted, Permittee shall log in ink, or in an electronic format, a record of the date, duration, control measures, MSDS, amount of paint consumed. Attachment "B", Sec. V.B.1.d	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
26	Opacity - Visible emissions from spray painting operations shall not have opacity greater than 20% using Method 9. Attachment "B", Sec. V.B.3	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
C. Demolition/ Renovation		
27	Permittee shall comply with and keep records as required by applicable requirements of 40 CFR 61, Subpart M (NESHAPS) and shall keep all required records in a file, including the NESHAP notification form and all supporting documents. Attachment "B", Sec. V.C.1 and 2	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A No demolition activities at this facility.



Fluoro-Seal

An ISO 9001:2000 Certified Company

July 22, 2013

Sent via Email and Courier

WEIWEN J. DALY,
Air Quality Inspector
Arizona Department of Environmental Quality
400 W. Congress, Suite 433,
Tucson Arizona
85701

Dear Ms. Daly:

Re: Air Quality Control Permit No. 48314
Barrier Treatment of plastic containers – Place ID: 17906
July 12, 2013 Compliance Inspection

As mentioned during the inspection on July 12, 2013, I have only recently joined Fluoro-Seal and since joining we have relocated our corporate offices. As a result, at this time, I am unable to determine whether the company has submitted Emissions Inventories (EIs) for production years 2010, 2011 and 2012 and Compliance Certifications.

In order to rectify this issue, Emissions Inventories (EIs) for production years 2010, 2011 and 2012 and Compliance Certifications for same have been submitted to the ADEQ (please see attached cover letter to Tai Wallace).

Also attached is Fluorine Cell Log and procedure for the Plant Manager or their designated employee to follow in the event a leak is detected in the process (Attachment "B", Part II).

Lastly, attached is our Parking Lot Dust Cleaning Log (Attachment "B", Part IV(B)(1.)(a)(iii)-(B)(1.)(a)(iii))

I trust that the enclosed confirms that the Fluoro-Seal International, L.P., Yuma facility is now compliant with all the Inspection Checklist Items.

Thanking you in advance for your patience.

Respectfully,

A handwritten signature in black ink, appearing to read 'F. Nicholas', written in a cursive style.

Frederick Nicholas, HSE Director

PROCEDURE FOR LEAK DETECTION AND REPAIR

Purpose: The following procedure is used to detect a leak in the system and to notify the responsible individual of the leak so as remedial steps may be taken to repair the leak.

Responsible Parties:

- The Plant Manager or their designated employee shall be responsible for ensuring that there are no leaks in the system and to initiate steps to repair the leak. The Plant Manager or their designated employee shall notify the HSE Director of the leak. The Plant Manager or designate is also responsible for completing an incident report.
- The HSE Director is responsible for determining whether the release is reportable and notifying the ADEQ if the leak (release meets the threshold for reporting. He HSE Director is also responsible for assisting in a Root Cause Analysis, if in fact an actual leak did occur.
- Production Operators are responsible for monitoring the Operator Control Panel where the system pressure is displayed.

Procedure:

1. As the Fluoro-Seal Fluorination Process operates at sub-atmospheric pressure (under vacuum), if the system pressure displayed on the Operator Control Panel rises rapidly, a leak in the system may be present.
2. Upon noticing the rapid spike in pressure, the Production Operator is to immediately turn the fluorine cell off from the Operator Control Panel.
3. The Production Operator then turns the ball valve on the top of the fluorine tank to the "Off" position.
4. The Production Operator shall then notify the Plant Manager, or designate of the potential leak.
5. The Plant Manager or Designate shall confirm whether the increase in pressure displayed on the Operator Control Panel increased at a rate characteristic of a leak.
6. If the Plant Manager determines that there is a leak, each valve must be checked with a Draeger Tube to identify the location of the leak.
7. Once the location of the leak is identified, the leaking component and associated process piping must be isolated and purged with nitrogen gas.

8. During the purging of the system or as soon as practicable after taking remedial actions, the Plant Manager or designate shall inform the HSE Director of the leak.
9. Where a leak is confirmed, the HSE Director shall submit a Notification of Release to the relevant Arizona government agencies.
10. The vacuum pump is turned off once all fluorine, hydrogen fluoride and hydrogen have been evacuated from the system.
11. The leaking component is then replaced, additional nitrogen gas is introduced into the system and the vacuum pump is restarted.
12. The Operator monitors the Operator Control Panel pressure reading until the system returns to vacuum (sub-atmospheric pressure).
13. Once the system returns to vacuum and holds a vacuum for 2 (two) hours, the fluorine tank valve shall be opened and the fluorine cell restarted.
14. The HSE Director shall review the incident report and make the necessary arrangements for the performance of a Root Cause analysis.

Recordkeeping:

- Records of the date of leak, estimated amount of leak, leak location, component that leaked, and actions taken to repair the leak, and agencies notified shall be documented.
- Records of the leak shall be maintained for a period of 5 (five) years.