



United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

**Air Branch Inspection Report
Unannounced Partial Compliance Evaluation
3P Processing**

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Wichita, Kansas 67213
FRS# 110000446447

Inspection Date(s):
September 12-13, 2023

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CONTENTS

INSPECTION OVERVIEW	3
INSEPCION OBJECTIVE.....	3
FACILITY CONTACT INFORMATION.....	3
FACILITY OVERVIEW	3
FACILITY OPERATIONS SUMMARY.....	5
FIELD ACTIVITIES SUMMARY	5
Measurement and/or Sampling Activities.....	6
INSPECTION OBSERVATIONS AND POTENTIAL FINDINGS.....	7

TABLES

Table 1. PROJECT TEAM MEMBERS.....	Error! Bookmark not defined.
Table 2. FACILITY CONTACT INFORMATION	3
Table 3. APPLICABLE REGULATIONS AND STANDARDS	4
Table 4. FIELD MEASUREMENTS ACTIVITIES.....	7

APPENDICES

- A Receipt for Documents (2 pages)
- B Field Photographs (53 pages)
- C Request for Documents (1 page)

**This Contents page shows all the sections contained in this report
and provides a clear indication of the end of this report.**

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the partial compliance evaluation (PCE) inspection was to determine compliance of the facility with the Clean Air Act (CAA), with an emphasis on those requirements located in the code of federal regulations at 40 CFR Part 63 Subpart GG, National Emission Standards for Aerospace Manufacturing and Rework Facilities, 40 CFR Part 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning, and 40 CFR Part 63 Subpart N, National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. The inspection was part of the U.S. Environmental Protection Agency's (EPA) Creating Cleaner Air for Communities National Enforcement Compliance Initiative. A Resource Conservation and Recovery Act (RCRA) inspection was performed concurrently with the CAA inspection. The RCRA inspection was led by Marc Matthews, who will issue a separate report for RCRA observations and potential findings.

Table 1 lists the inspection team members.

Table 1. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
Charlotte Papp	EPA, Region 7, ECAD, Air Branch	Lead Inspector - Air
Marc Matthews	EPA, Region 7, ECAD, RCRA	Field team member - RCRA
Amy Wooten	KDHE	Field team member - RCRA
Josh Webb	KDHE	Field team member - Air
Mickey Haynes	KDHE	Field team member - Air

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name	Title	Email Address
Nick Hoppes	EHS Manager	Nicholas.hoppes@3p-p.com

FACILITY OVERVIEW

According to the 3P Processing Title V operating permit, issued by The Kansas Department of Health and Environment (KDHE), the facility is subject to the following regulations and standards subject to review during this inspection (**Table 3**).

Table 3. APPLICABLE REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR Part 63	Subpart GG, National Emission Standards for Aerospace Manufacturing and Rework Facilities
40 CFR Part 63	Subpart T, National Emission Standards for Halogenated Solvent Cleaning
40 CFR Part 63	Subpart N, National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks
40 CFR Part 63	Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

The facility was issued an initial Class I Air Operating Permit on January 15, 2004. The permit was renewed on April 1, 2010, December 16, 2015, and May 17, 2021, which is the current operating permit.

According to the permit, the facility wide controlled potential-to-emit (PTE) for a single Hazardous Air Pollutant (HAPs, Trichloroethylene) is above the major source threshold of 10 tons per year (tpy), combined HAPs are above the major source threshold of 25 tpy, and PM10 and Volatile Organic Compounds (VOCs) are above the major source threshold of 100 tpy.

According to the Enforcement and Compliance History Online (ECHO) database, the facility had a formal enforcement action in 2020 with KDHE for CAA violations. The facility is listed in ECHO as having high priority violations from October 2020 through June 2021. The most recent CAA monitoring event was a PCE conducted by KDHE on January 10, 2023, which found no violations.

The following areas of the plant fall under requirements of 40 CFR Part 63 Subpart GG: housekeeping measures (40 CFR 63.744(a)), hand-wipe cleaning, (40 CFR 63.744(b)), spray gun cleaning (40 CFR 63.744(c)), flush cleaning (40 CFR 63.744(d)), primer and topcoat applications (40 CFR 63.745), touch-up operations (40 CFR 63.745 and 40 CFR 63.741(f)), and waste storage and handling operations (40 CFR 63.741(e)). Note, waste storage and handling is exempt from this subpart since it falls under RCRA requirements.

According to the facility operating permit, the facility is complying with 40 CFR Part 63 Subpart T for emission sources EU-VD01 (Vapor Degreaser No. 1) and EU-VD02 (Vapor Degreaser No. 2) requirements via control option #6, freeboard refrigeration device, reduced room draft, freeboard ratio of 1.0 (40 CFR 63.463(b)).

40 CFR Part 63 Subpart N sets emission limits, monitoring requirements and work practice standards for EU-CRTANK01, the Chromic Anodize Tank. Such requirements include monitoring and recording velocity pressure at inlet of scrubber and pressure drop across scrubber system

(40 CFR 63.343(c)(2)(ii)) and developing a written operation and maintenance plan (40 CFR 63.344(d)).

According to the facility operating permit, emission sources EU-BOILER01 and EU-BOILER02 (natural gas-fired industrial boilers 1 and 2) onsite must meet requirements of 40 CFR Part 63 Subpart DDDDD including initial equipment tune-ups and follow up tune-ups ever two years (40 CFR 63.7500(a) and (e)), and operating the boilers in a manner consistent with safety and good air pollution control practices for minimizing emissions (40 CFR 63.7500(a)(3)).

FACILITY OPERATIONS SUMMARY

According to the facility operating permit, "Operations at the 3P Processing, Inc. facility include alkaline and acid cleaning of metals, anodizing aluminum; chemical treatment of aluminum, titanium, and other metals; and surface coating of aluminum and steel parts. The facility mainly contracts these operations to the aerospace manufacturing industry. The facility utilizes small media blasting and shot peening devices for metal cleaning and treatment, and fluorescent penetrant and magnetic particle systems for quality control inspections. Surface coatings and paints are applied in paint booths and drying ovens are used as part of the coatings process. In general, the facility receives pre-fabricated parts from clients for finishing (e.g., anodizing, painting, etc.) When a project is complete, the parts are delivered back to the client." Air pollution control devices include filter banks for each of the 10 paint booths, a scrubber for the Chromic Anodize Tank, and two vapor degreasers with chilled air blankets. The facility also has natural gas fired space heaters, a natural gas drying oven, a quality control/research laboratory, shot peen units, sand blast units, and metal processing tanks.

FIELD ACTIVITIES SUMMARY

I arrived at the facility on September 12, 2023. There were no visible emissions as we drove by the facility. I made entry at the front office and introduced myself and members of the inspection team, presented my credentials, and provided my business card to Mr. Hoppes. I was given a facility safety briefing by Mr. Hoppes. I conducted an opening conference during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CAA specifically, to determine compliance with the conditions listed in Table 3. I explained that after asking for some general business information, I would observe work practices, emission units, and control equipment and review associated records demonstrating compliance with the standards. I explained to Mr. Hoppes that the facility could make a claim of business confidentiality and provided him with a Confidential Business Information form. Mr. Hoppes did not make a claim of confidentiality at that time, nor was the form submitted with the other documents requested, so I assumed there were no CBI concerns.

I was given a facility tour by Mr. Hoppes. I was asked to wear the following PPE by Mr. Hoppes for general site safety: safety glasses.

We began the tour at 9:22 a.m. at the shipping and receiving area then continued to the shot peen process area. We then went down Process Line 1, the titanium hard anodize line, then Process Line 6, the steel process line.

Afterwards we saw Vapor Degreaser 1 and spoke with the operator on duty about the process. We continued to view Process Lines 2 and 3 and the monitoring devices for the scrubber on Line 2. From this process area we continued through the masking room and into Paint Room 1, which contains paint booths 1-4. We next went to Paint Crib 1 (a paint mixing and preparation room), then Paint Room 2 which houses paint booths 5-7. From there we saw the sanding room, then the final paint room (paint room 3) with paint booths 8-10. All paint booths and associated monitoring devices were individually inspected.

We saw the topcoat paint crib (mixing room) then continued to the hazardous waste storage area located near the EHS office. We returned to the conference room at approximately 11:46 a.m. and broke for lunch. We spent the afternoon in the conference room reviewing records.

On day 2 (September 13, 2023) we arrived onsite at 8:10 a.m. We met briefly in the conference room, then went to Process Line 2. From there we went to the front of the facility to view the stacks with the Forward Looking Infrared (FLIR) camera. We returned to the conference room and continued our records discussion. At 10:19 a.m. we began preparing for the closing conference.

I conducted a closing conference with the staff listed in Table 2. I provided the facility with copies of the small business information resource sheet, and a Receipt for Documents (Appendix A). We discussed potential compliance concerns and outstanding records that would need to be sent to me electronically. We agreed on a submission deadline of September 29, 2023. On September 28, 2023, I received the records from Mr. Hoppes via a OneDrive folder.

Site sampling activities are described in the **Measurement and/or Sampling Activities** section below.

Observations and potential findings from the facility tour, and records review, and sampling/measurement activities are noted in the **Investigation Observation and Potential Findings** section below.

Measurement and/or Sampling Activities

I used a FLIR camera to observe several potential emission sources during the onsite inspection. **Table 4** summarizes field measurement and field sampling activities.

All environmental measurement activities were performed in accordance with the EPA Region 7 quality system. I followed manufacturer and EPA processes for instrument calibration; instrument calibration was documented in the instrument's log-book.

Table 4 summarizes field measurement activities.

Table 4. FIELD MEASUREMENT ACTIVITIES			
Location Identifier	Date(s) and Time	Method and/or Procedure ¹ , and Equipment	Measurer Name
Process Line 2 above heated tank	9/12/2023 10:28 am	Region 7 procedure: <i>FLIR GF320</i> Equipment: Teledyne, GF320, Serial Number 44402263	Charlotte Papp
Chromic Anodize Tank	9/13/2023 8:27 am	Region 7 procedure: <i>FLIR GF320</i> Equipment: Teledyne, GF320, Serial Number 44402263	Charlotte Papp
Front of facility across street	9/13/2023 8:32 am	Region 7 procedure: <i>FLIR GF320</i> Equipment: Teledyne, GF320, Serial Number 44402263	Charlotte Papp
Front of facility across street	9/13/2023 8:36 am	Region 7 procedure: <i>FLIR GF320</i> Equipment: Teledyne, GF320, Serial Number 44402263	Charlotte Papp
¹ The current version of each procedure, at the time of the investigation, was followed.			

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions and activities were documented in field records. All photographs are attached as **Appendix B**. I made the following observations during the inspection. I discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

While walking through the shot peen area I observed a considerable amount of debris on the ground that was not being adequately cleaned (Photo 1).

I observed some potential corrosion on front of a tank in line 6 (Photo 7).

I observed a yellow substance spilled and/or corroded into the floor on Line 6 in front of a tank labeled "Nitric Passivate" (Photo 8).

The velocity pressure gauge was not working on Line 2 scrubber while on site. Mr. Hoppes informed us that during rain events the pitot tube will sometimes get flooded with water, and the facility has to clean it out before taking a reading (Photo 13-14).

While using the FLIR camera to observe the stacks, I observed intermittent plumes that appeared to be coming from behind the facility. I asked Mr. Hoppes if there was another facility that may be emitting the plumes. He informed me that the facility staff have noticed vagrants living on that property with several instances of disturbing behavior having been reported to local authorities.

Subpart GG Records:

Solvent-laden cloths appeared to be placed into containers, however many did not appear adequately closed according to Marc Matthews.

Handwipe cleaning use alcohol and MPK wipes which comply with 40 CFR 63.744(b)(2).

According to lead paint supervisor Luis Esparza, spray guns are cleaned using the nonatomized cleaning method described in 40 CFR 63.744(c)(2).

Each paint booth had a pressure gauge across the filter banks, and pressure readings were taken at the beginning and end of each shift. I did not observe any pressure readings outside the specified recommended limits.

3P Processing receives monthly reports from GRACO Supply Integrated Services detailing the VOC content of each topcoat and primer, as well as the quantity used during that month and the averaged VOC content pursuant to 40 CFR 63.743(d). Safety Data Sheets were also provided for each unique topcoat and primer. All VOC averaged limits for topcoats were under the limit of 3.5 lbs/gal, and all VOC averaged limits for primers were under the limit of 4.5 lbs/gal for the past five years. It is assumed that the VOC content is acting as a surrogate for organic HAP content as is allowable per 40 CFR 63.750(c)(1).

Subpart T records:

Monthly and quarterly inspection records were submitted to EPA. As of the date of this report, all records appear to demonstrate compliance with Subpart T requirements.

Subpart N Records:

Daily readings of scrubber inlet velocity pressure and pressure drop across the system were reviewed onsite. I did not see any issues in the record reviewed, thus did not deem it necessary to request five years of these records. Weekly and quarterly inspection records as well as the

2023 Operation and Maintenance plan for the scrubber were submitted as part of the records requested. All inspection records appear complete and demonstrate compliance. The 2023 Operation and Maintenance plan appeared adequate.

Subpart DDDDD records:

I reviewed maintenance records demonstrating tune-up compliance requirements for both boilers for calendar years 2023, 2021/2020, and 2019. Other records were submitted for 2015, and potentially 2018, though the file is not discernable.

Potential Finding 1: Vapor degreaser near doorway / windspeed monitoring not done in representative conditions
Observation Summary: Vapor Degreaser 1 is located near a doorway with intermittent draft.
Citation: 40 CFR 63.466(d)
Evidence: Site Map, Inspection Notes
Description of Observation: To demonstrate compliance with 40 CFR Part 63 Subpart T, the facility has chosen to operate it's vapor degreasers with a freeboard ratio of 1, a freeboard refrigeration device, and a reduced room draft. The windspeed above the vapor degreaser is measured quarterly and must be <50 ft/min to be in compliance. The records in "Degreaser Information.xls" indicate that the windspeed was below the 50 ft/min during the inspection. However, when touring the facility, I noted that Vapor Degreaser 1 is located near a doorway that produces a noticeable draft when opening and closing. Further investigation into whether windspeeds have been measured during these periods of increased airflow is warranted to determine compliance with this requirement.

End of report.