



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center – 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Air Act Inspection of Warrior Roofing
Inspection Date(s): July 19, 2022
Regulatory Program(s): SIP, NESHAP, NSPS

Company Name: Warrior Roofing Manufacturing of PA, LLC
Facility Name: Warrior Roofing
Facility Location: 323 Development Avenue
Chambersburg, PA 17201
Latitude: 39.949007 **Longitude:** -77.648861
County/Parish: Franklin

AFS Number: PA000573590
Permit Number: 28-03039
NAICS Code: 324122 **SIC:** 2952
Unique Project #: 3EA22CA082A

Facility Representatives:	Point of Contact
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EPA Inspectors:
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EPA Lead Inspector

Signature

Bruce Augustine

Date

Four Penn Center – 1600 John F Kennedy Blvd
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Supervisor

Signature

Kristen Hall
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Date

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Warrior Roofing Manufacturing of PA, LLC (Warrior or Facility) to verify compliance with applicable State and Federal regulations. The Pennsylvania Department of Environmental Protection (PADEP) was notified of the inspection on June 27, 2022, via email. On July 18, 2022, EPA notified the Facility of the planned inspection via phone and email. EPA sent an email to Doug Shaffner prior to the inspection confirming the inspection (see Attachment 1). The email also included a list of records to review during the inspection (see Attachment 3). These records are listed in the Records Review section of the report.

A. Summary of the Facility

The Facility is located at 323 Development Avenue, Chambersburg, PA. The Facility was constructed and commenced operation as Warrior Roofing in 2002 and has always operated as a felt roofing manufacturing facility. The site comprises approximately 21 acres with 58,000ft² under roof. There are currently 11 full time employees and operates a single 12 hour shift. Warrior operates 3-4 days per week depending on raw material availability and product demand. Mr. Shaffner indicated that in the past, he Facility normally operated 24 hours/day and five days/week, however, demand and raw material availability have caused them to run a reduced schedule. Warrior Roofing was founded in Tuscaloosa, AL in 1978 and still operates a facility there. The company headquarters is located at the Alabama site.

The Facility received a minor source permit (No. 28-03039) from PADEP issued on February 6, 2019.

Warrior is classified by PADEP as a minor source for all criteria pollutants and hazardous air pollutants. The Facility is subject to, or potentially subject to the following federal regulations:

- 40 C.F.R. Part 63, Subpart AAAAAAA: National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing (MACT 7A)
- 40 C.F.R. Part 60, Subpart UU: Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture (NSPS UU)

B. Inspection Opening Conference

At 8:38AM on July 19, 2022, EPA arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Warrior was represented by Doug Shaffner and Vincent VanValken. Also, Kelley Matty and Courtney Gera from PADEP were present. EPA inspector, Bruce Augustine presented his credentials and explained the purpose of the visit was to conduct a full compliance evaluation (FCE) to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, Mr. Shaffner did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

Warrior Roofing's Chambersburg site manufactures rolled felt roofing of various weights for residential and commercial applications. The main customers are Home Depot and Lowe's, as well as some smaller customers. Warrior receives 3000lb rolls of paper from two main suppliers (Mule Hyde and Maryland Paper) in 15W and 30W weights. Approximately nine loads of paper arrive each week via truck. The rolls of paper are stacked before being prepped for processing.

The rolls are unrolled using a looper before being sent through a saturator, where it is dipped into a heated asphalt bath. Warrior controls the thickness of the asphalt application by the speed of the paper line and the depth of the asphalt bath. The thickness of the asphalt layer is also controlled using a scraper at the end of the saturator that removes excess asphalt. The asphalt bath is heated to 400°F so that the asphalt doesn't harden. Mr. Shaffner stated that the Facility tries to maintain the asphalt bath at a depth of eight feet.

Four to five loads of asphalt are shipped to the Facility in tanker trucks from either United Refining or Erie Enterprises. Asphalt which arrives at the Facility is placed into one of two identical asphalt tanks. The tanks are heated with natural gas burners to prevent the asphalt from hardening at ambient temperatures.

Once the paper exits the saturator, it travels up an incline ramp that has rollers heated with steam to dry the paper. After the incline ramp, additional paper drying is achieved using a wet looper. The paper is then wound and cut and then packaged and palletized.

Warrior operates two identical process lines which manufacture the same products and have the same capacity. Both lines were constructed when the plant began operation and have the same capacity. According to Warrior representatives, the only difference in the two lines is that one has smooth rollers and one has fluted rollers. The saturators on both process lines are enclosed and vapors from the process are routed to a header which is vented to air filters and a regenerative thermal oxidizer (RTO) to control particulate matter (PM), volatile organic compounds, (VOC), and hazardous air pollutants (HAP). The incline ramp for both process lines also has a hood, but not a total enclosure, to capture emissions and route them to the emission control devices. The two heated asphalt tank emissions are also routed to the filters and RTO. Warrior indicated that the CECO air filters were installed when the plant was constructed, however, the RTO was installed in 2006 for "odor control". The CECO air filters utilize large bag filters to remove PM and oil mist from the gas stream from the asphalt tanks and process lines before it is sent to the RTO. Warrior indicated that the bags are changed every five to six years.

At the end of every shift, Warrior shuts down the two process lines and allows the saturators to cool down below their heated operating temperature. They do not, however, achieve ambient

temperature. Mr. Shaffner also stated that they conduct preventative maintenance each month and that the Facility undergoes an annual two week maintenance shutdown in January/February.

Warrior operates a cold parts washer to clean tools. The parts washer was manufactured by Crystal Clean and has been onsite for approximately eight years. The Facility stated that the parts washer uses water based solvents and all maintenance and solvent additions are performed by Crystal Clean. Representatives come to the site quarterly to perform any necessary maintenance.

The opening conference concluded at 9:35AM.

III. Observations

The EPA inspector was led on a walkthrough of the Facility immediately following the opening conference by Doug Shaffner and Vincent VanValken of Warrior and Kelley Matty and Courtney Gera, of PADEP, were also present for the walkthrough. The EPA inspector noted photos would be taken during the Facility walkthrough (Attachment 2).

Raw material paper storage was inspected. Warrior stacks rolls of paper near the beginning of process lines 1 & 2. Mr. Shaffner stated that Warrior can process 17 rolls of 20 gauge paper each 12 hour shift and 21 rolls of 29 gauge paper each shift. Both process lines were operating during the inspection. Line 1 was operating at 580feet/min, as observed on the process screen. The steam generator is located adjacent to process line 1 and was in operation. Warrior produces 200-240lb steam for the rollers used in drying the paper. The steam generator is heated with natural gas.

The loopers, saturators, incline ramps, and wet loopers for both process lines were observed. The enclosure for both process line saturators were observed, including the collection header routing emissions to the filters and RTO. The rolling and packaging at the end of each process line was also observed. Warrior stores finished product in the warehouse area. Warrior manufactures roofing under their own brand name and under the name Huttic Roofing.

The inspection team proceeded outside of the building. The two asphalt tanks were observed and the burners for both tanks were firing natural gas to heat the asphalt. EPA observed the process line collection headers exiting the side of the building and entering the CECO air filters. The emission header from the asphalt tanks was also observed. The asphalt tanks, CECO air filters, and RTO are located within a containment area which contained several inches of oily water. The inspection team did not enter this area. The steam generator stack was observed exiting the side of the building. There are two large tanks located between the asphalt tanks and the CECO filters. Mr. Shaffner stated that these are oil knockout tanks where any liquid oil can drop out of the gas stream before it goes to the air filters. He also stated that the two knockout tanks are emptied approximately every two years. The CECO air filters vent to the RTO, which was operating during the inspection. The RTO has two combustion chambers, which alternate firing every two minutes. Warrior maintains the RTO above 1200°F during process line operation. Mr. Shaffner stated that Warrior bypasses the RTO when the process lines are not operating or at the

end of each operating day. During the inspection, EPA could hear the two chambers of the RTO alternating every two minutes.

The inspection team returned indoors and a set of backup filters for the CECO air filters was observed. EPA also observed the RTO process screen indicating a combustion chamber temperature of 1396°F and an exhaust temperature of 233°F. The inlet temperature to CECO air filter 1 was 158°F with a pressure drop of 6"WC and the inlet temperature to CECO air filter 2 was 154°F with a pressure drop of 9.4"WC.

Finally, the inspection team observed the Crystal Clean parts washer. The parts washer was not operating during the inspection. The label on the parts washer indicated Crystal Clean Model 2725 and solvent Mirachem 2750. Warrior representatives again stated that Crystal Clean conducts all maintenance on the parts washer.

The walkthrough concluded at 10:46AM

IV. Records Review

The records review commenced immediately after the plant walkthrough at 10:56AM. EPA and Warrior Roofing reviewed the list of records requested prior to the inspection. Below is a summary of the records requested, the records reviewed onsite, and records still to be provided:

1. A copy of a facility plot plan or diagram showing the process lines.
 - a. A photograph of a hardcopy plot plan was taken during the review and noted in the photographs in Attachment 2.
2. Provide copies of monthly emission calculations for NO_x, PM, VOC and HAP for January 2019-July 2022.
 - a. The Facility could not produce these records onsite and did not have emission calculations readily available electronically. Mr. Shaffner agreed to inquire about the potential to emit calculations for these pollutants and provide them after the inspection. He indicated that they calculations may be in the most recent permit application.
3. Copies of annual emission statements submitted to PADEP for the years 2019-2021.
 - a. Being a minor source of air emissions, Warrior does not need to submit an annual emission statement. Mr. Shaffner stated that he sends operating data to the Warrior headquarters in Alabama and they could calculate emissions. EPA requested actual emissions calculations for the years 2019-2021 for each pollutant.
4. Copies of any stack tests conducted on the RTO or CECO air filters to determine emissions or destruction efficiency.
 - a. EPA reviewed a 2/5/2009 stack test conducted on the CECO air filters for VOC. EPA requested an electronic copy of this test be provided

5. For the RTO, provide the following information:
 - a. Make/Model
 - i. EPA reviewed the manufacturer specifications to be a CECO RTO rates at 22,000scfm
 - b. Design specifications;
 - i. The manufacturer design manual indicates that the RTO is designed to have a 97% destruction efficiency and is equipped with two burners;
 - c. Inlet/Outlet temperature monitoring data for January 2019-July 2022;
 - i. Mr. Shaffner indicated that the RTO temperature monitoring data downloads to a laptop and can be provided electronically to EPA. Furthermore, EPA reviewed several weekly chart records for RTO temperature.
 - d. Downtime records for the RTO;
 - i. Mr. Shaffner stated that these records can be provided to EPA electronically and will be uploaded
6. For each CECO air filter, provide the following records:
 - a. Manufacturer specifications;
 - i. EPA reviewed the manufacturer specifications manual provided by CECO. The filters are rated at 12,000acfm and that the maximum pressure drop across the system is 8-10"WC. The maximum temperature should also be 120°F.
 - b. 3 hour average inlet temperature monitoring records for January 2019-July 2022;
 - i. Mr. Shaffner stated that these records are maintained electronically on a laptop and would be provided after the inspection.
 - c. Daily pressure drop records across each air filter for January 2019-July 2022;
 - i. Mr. Shaffner stated that these records are maintained electronically on a laptop and would be provided after the inspection.
 - d. Downtime records for the CECO air filters;
 - i. Mr. Shaffner stated that he would provide these records electronically after the inspection.

7. Provide electronic records of the following on a monthly basis for January 2019-July 2022:
 - a. Felt production for each process line;
 - i. EPA reviewed monthly records of felt production and asphalt usage. A photograph was taken of the June 2022 production table and is included in Attachment 2 to this report.
 - b. Natural gas usage (MMscf) for each process line and the Facility as a whole;
 - i. Mr. Shaffner stated that the facility has single natural gas meter for the site. He agreed to provide monthly natural gas usage for the site electronically.
 - c. Liquid asphalt cement usage;
 - i. EPA reviewed monthly records of production and asphalt usage for the site.
8. List the date of each air permit application to PADEP.
 - a. Mr. Shaffner agreed to provide a copy of Warrior Roofing's most recent permit application to PADEP from June 2018.
9. List of each permit issued to the facility by PADEP since January 2015:
 - a. Warrior Roofing indicated that the current permit that is in effect is the only permit issued by PADEP within that time period.
10. Provide electronic copy of the site specific monitoring plan required by 40 C.F.R. § 63.11563(b);
 - a. EPA reviewed the site specific monitoring plan and Mr. Shaffner agreed to provide an electronic copy of the plan to EPA.
11. Provide electronic copies of the following notifications/reports:
 - a. Initial notification required by 40 C.F.R. § 63.11564(a)(2);
 - i. Mr. Shaffner indicated that this may have been submitted by the headquarters in Alabama and that he would attempt to obtain a copy and provide it to EPA.
 - b. Notification of compliance status required by 40 C.F.R. § 63.11564(a)(5);
 - i. Mr. Shaffner indicated that this may have been submitted by the headquarters in Alabama and that he would attempt to obtain a copy and provide it to EPA.

- c. Semiannual reports from 1st half 2019 through 1st half 2022, as required by 40 C.F.R. § 63.11564(b);
 - i. Mr. Shaffner indicated that this may have been submitted by the headquarters in Alabama and that he would attempt to obtain a copy and provide it to EPA.

12. For the parts washer (Source ID 102), provide the following information:

- a. Warrior Roofing provided copies of servicing records by Crystal Clean for the parts washer. These were reviewed onsite and indicate that the solvent Mirachem 2750 is used. An MSDS sheet for the solvent was also reviewed by EPA. No records for the parts washer were taken and no further records were requested.

On July 22, 2022, EPA emailed Mr. Shaffner clarifying which records were still outstanding and need to be provided to EPA.

V. Closing Conference

After the records review, EPA, Mr. Shaffner, Mr. VanValken had a brief closing conference to ask additional questions and discuss observations. EPA noted that the investigation is on-going, and any areas of concern identified in the final reports do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 12:37PM.

The following have been identified as *potential* issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by [Name].

- During the inspection, Warrior Roofing indicated that the RTO is bypassed when the process is down. Warrior does not remove the liquid asphalt from either process line at the end of the day. Also, the two asphalt tanks also vent to the RTO after the CECO air filters. A review of the temperature chart records for the RTO indicate that the RTO temperature drops below 1200°F each week. Permit condition Permit condition E.I.004 (Pg 22) requires that the oxidizer shall maintain a minimum destruction temperature of 1200°F.
- The manufacturer specification for the CECO air filters maximum temperature is 120°F. Warrior is maintaining the inlet temperature above 150°F. Warrior should confirm the correct operating temperatures for the CECO air filters to operate as designed.
- The steam generator used in the process is not listed as an individual source in the existing permit. It may have been included as part of one of the process lines in the permit application.

- A closer review of the emission calculations and stack tests is needed to determine if the source is a minor source and if the source is meeting the emission limits of NSPS UU and MACT 7A. A review of the Notification of Compliance Status is necessary to determine if Warrior is required to operate the RTO to meet the emission limits in MACT 7A.

VI. List of Attachments

- Attachment 1: Email correspondence to Dave Shaffner of records requested to review during inspection
- Attachment 2: Photo Log
- Attachment 3: Copy of Records Requested

Attachment 1

From: [Augustine, Bruce](#)
To: doug@warriorroofing.net
Cc: kmatty@pa.gov; [Gera, Courtney](#)
Subject: EPA Inspection Warrior Roofing
Date: Monday, July 18, 2022 9:44:00 AM
Attachments: [EPA Record Request Warrior Roofing.docx](#)

Mr. Shaffner,

Per our conversation this morning, EPA is planning to conduct an inspection of Warrior Roofing's Chambersburg, PA facility on Tuesday July 19, 2022. The inspection will focus on the air permit issued by PADEP and any applicable federal air regulations. The inspection will consist of an opening conference to discuss facility history and current operations in specifics (including air emission sources), a plant walkthrough, and a records review/closing conference. Be advised that EPA will take photographs during the walkthrough. Attached to this email is a request for specific records to be available during the inspection. Please attempt to have as much of the request available as possible for review. I will also send you a separate email with a link to upload the records electronically to a file sharing site. As I mentioned on the phone, Warrior Roofing has the right to claim any records or photographs provided to EPA as confidential business information (CBI).

I plan to arrive at the facility between 8:30-8:45AM tomorrow. Two inspectors from PADEP will also be present for the inspection. As you indicated, safety glasses and steel toe shoes are recommended for the inspection. If you have any questions regarding the inspection or the records requested, you can reach me at the number below. Thank you.

Bruce J. Augustine
Environmental Scientist
Enforcement & Compliance Assurance Division
Air Section
USEPA Region III
1650 Arch Street
Mailcode: 3ED21
Philadelphia, PA 19103
(215) 814-2131

Attachment 2



1. Raw Material Paper Rolls and Scrap – Warrior Roofing – 7/19/22



2. Raw Material Paper Roll Storage – Warrior Roofing – 7/19/22



3. Steam Generator Nameplate – Warrior Roofing – 7/19/22



4. Process Steam Generator – Warrior Roofing – 7/19/22



5. Enclosed Paper Saturator Line 1 – Warrior Roofing – 7/19/22



6. Saturated Paper Incline Ramp Line 1 – Warrior Roofing – 7/19/22



7. Enclosed Paper Saturator Line 2 – Warrior Roofing – 7/19/22



8. Vapor Collection Ductwork above Saturator – Warrior Roofing – 7/19/22



9. Finished Product Looper Line 2 – Warrior Roofing – 7/19/22



10. Process Lines 1 & 2 – Warrior Roofing – 7/19/22



11. Finished Product Roll Storage – Warrior Roofing – 7/19/22



12. Two Heated Hot Asphalt Tanks – Warrior Roofing – 7/19/22



13. Steam Generator Stack – Warrior Roofing – 7/19/22



14. Oil Knockout Tank – Warrior Roofing – 7/19/22



15. Two CECO Air Filters – Warrior Roofing – 7/19/22



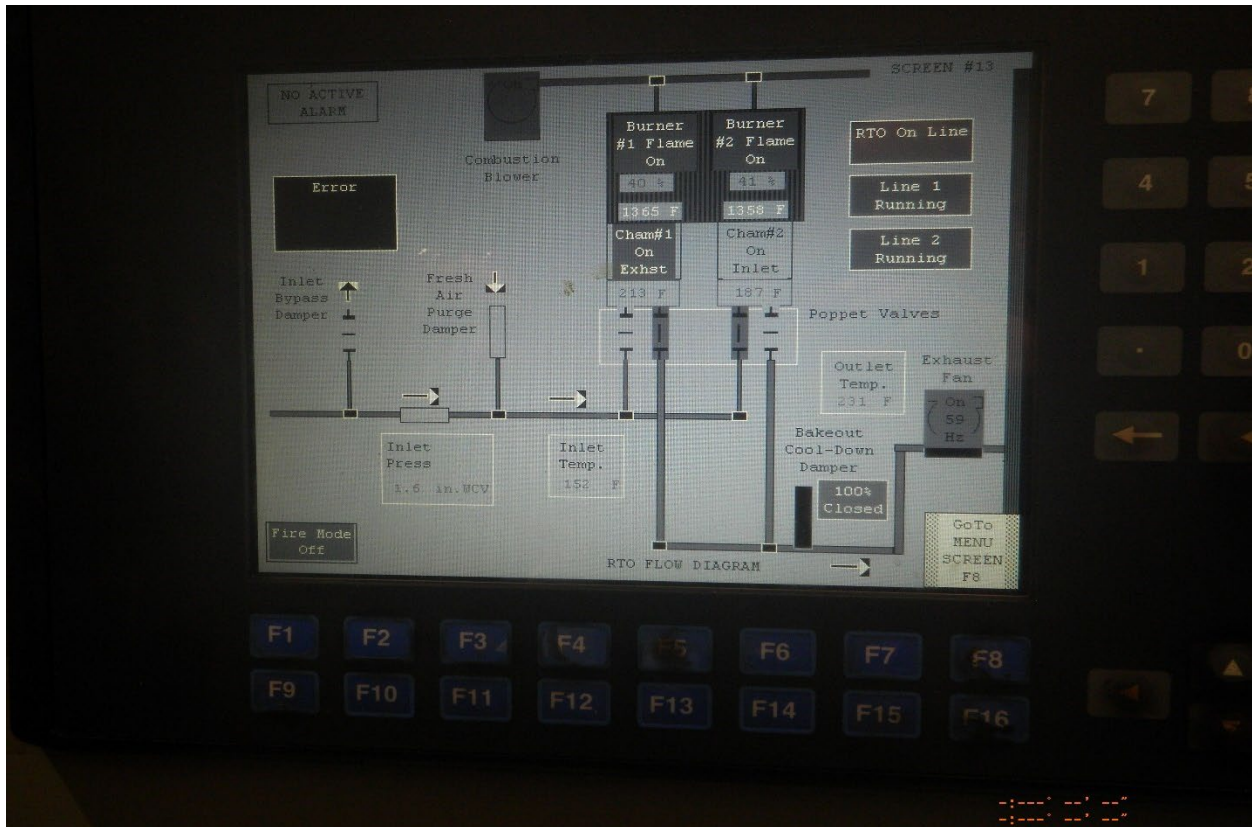
16. Regenerative Thermal Oxidizer Stack – Warrior Roofing – 7/19/22



17. Regenerative Thermal Oxidizer Combustion Chambers – Warrior Roofing – 7/19/22



18. Extra CECO Air Filters – Warrior Roofing – 7/19/22



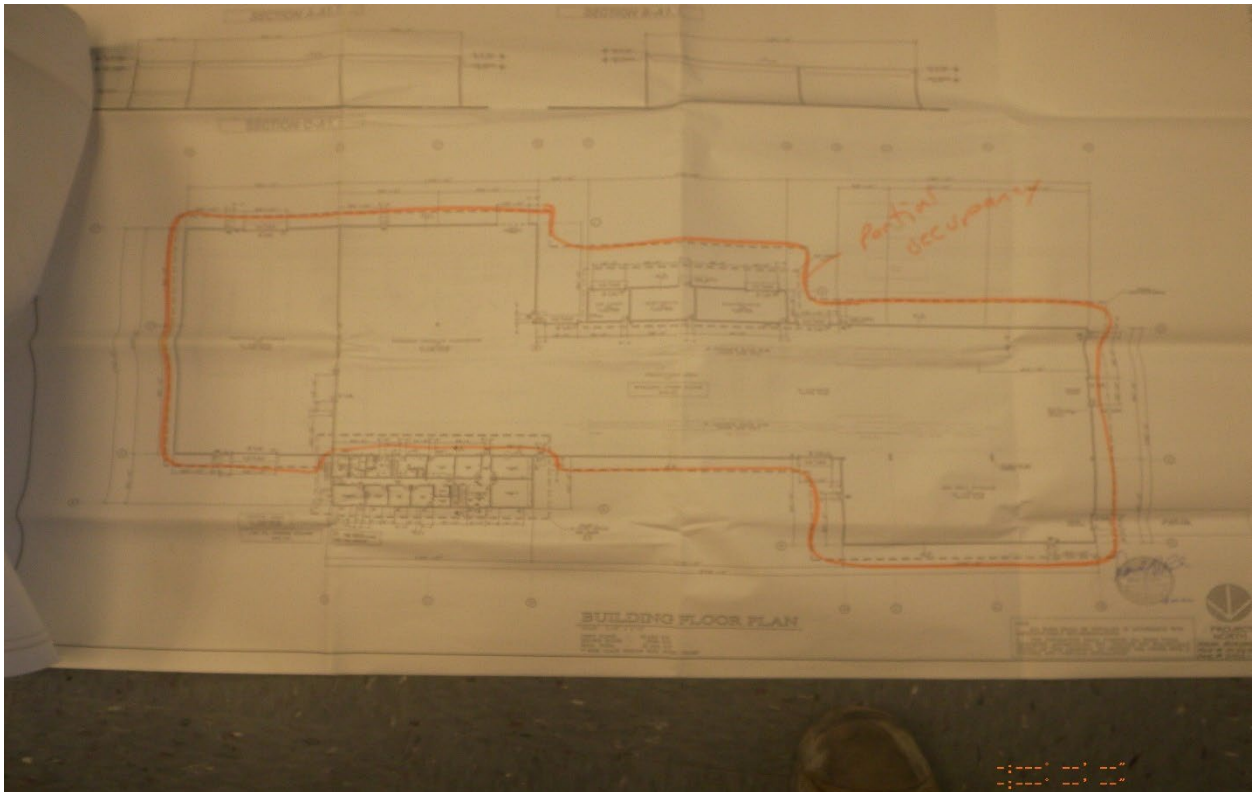
19. Control Room Thermal Oxidizer Screen – Warrior Roofing – 7/19/22



20. Regenerative Thermal Oxidizer Bypass Stack – Warrior Roofing – 7/19/22



21. Crystal Clean Parts Washer – Warrior Roofing – 7/19/22



22. Facility Plot Plan – Warrior Roofing – 7/19/22

Attachment 2 – Warrior Roofing Inspection Photos July 19, 2022

Warrior Roofing Manufacturing of PA., LLC
Asphalt Usage & Finished Product Tally Sheet

Line # 1

Week	18" Split 30 ASTM	15 ASTM	15 W	15 (400 SQ)	18" Split	30 W	30 ASTM	30 (200 SQ)	Building Paper	15 CERT	15 ASTM Perf
6/6/2022						16912					
6/13/2022			3040			8322					
6/20/2022						1710	475				
6/27/2022	750		418		456		1600				
TOTAL	750	0	3458	0	456	26944	2075	0	0	0	0

Line # 2

Week	18" Split 30 ASTM	15 ASTM	15 W	15 (400 SQ)	18" Split	30 W	30 ASTM	30 (200 SQ)	Building Paper	15 CERT	15 ASTM Perf
6/6/2022			1672								1300
6/13/2022			2166			38					
6/20/2022			2508						608		
6/27/2022			3192								
TOTAL	0	0	9538	0	0	38	0	0	608	0	1300

Asphalt Usage June 2022 (Both Lines # 1 and # 2)

Weeks	Gallons: Tons	
6/6/2022	61880	262.99
6/13/2022	24581	104.47
6/20/2022	30176	128.25
6/27/2022	35343	150.21

23. June 2022 Production Spreadsheet – Warrior Roofing – 7/19/22

Attachment 3

Records Requested by EPA

Warrior Roofing

July 19, 2022

Please provide all records electronically, unless otherwise specified. Any records that are being claimed CBI should be clearly marked as such. EPA will provide a link for Warrior to upload requested records.

1. Provide a hardcopy of a facility plot plan or diagram which identifies the process lines, emissions points, and control devices.
2. Provide electronic copies of monthly emission calculations (tons or lb/process measurement) for each NO_x, PM, VOC and hazardous air pollutant (HAP) for the period January 2019-July 2022. For pollutants where CEMS are used to monitor emissions see Question 2.
3. Provide electronic copies of annual emission statements submitted to PADEP for calendar years 2018-2021.
4. Provide electronic copies of any stack tests which have been conducted on the oxidizer, high velocity air filters, or any other emission sources that were conducted to determine compliance with emission limits, device control efficiency, or to establish operating parameters.
5. For the regenerative thermal oxidizer or any other combustion device used to control emissions from the asphalt roofing process lines, provide the following electronic records:
 - a. Make and model;
 - b. Manufacturer specifications;
 - c. Inlet/Outlet temperature monitoring data for the period January 2019-July 2022;
 - d. 3 hour average combustion zone temperature for January 2019-July 2022;
 - e. Downtime records (duration, reason).
6. For each high velocity air filter provide the following electronic records:
 - a. Manufacturer specifications;
 - b. 3 hour average inlet temperature records for January 2019-July 2022;
 - c. Daily pressure drop records across each filter for January 2019-July 2022;
 - d. Downtime records (duration, reason).
7. Provide electronic records of the following information on a monthly basis for January 2019-July 2022:
 - a. Felt production for each process line;
 - b. Natural gas usage (MMscf) for each line and the facility as a whole;
 - c. Liquid asphalt cement usage.
8. List the date of each air permit application submitted to PADEP and the type of permit application submitted (i.e., plan approval, Title V, New Source Review, etc.) since January 2015.
9. Provide a list of each air permit issued to the facility by PADEP since January 2015.
10. Provide an electronic copy of the site specific monitoring plan required by 40 C.F.R. § 63.11563(b).
11. Provide electronic copies of the following notifications/reports:
 - a. Initial notification required by 40 C.F.R. § 63.11564(a)(2) (*may have been submitted in 2010*);
 - b. Notification of compliance status (NOCS) required by 40 C.F.R. § 63.11564(a)(5) (*may have been submitted in 2010*);

- c. Semiannual reports from 1st half 2019 through 1st half 2022, as required by 40 C.F.R. § 63.11564(b).
12. For the parts washer (Source ID 102) provide the following information:
- a. The date the washer was installed and the capacity (gallons) of the unit;
 - b. Calculations of the freeboard ratio;
 - c. The amount of each solvent (gallons or pounds) purchased monthly from January 2019-July 2022;
 - d. The amount of solvent added to the parts washer monthly (gallons) from January 2019-July 2022;
 - e. The vapor pressure of each solvent purchased from January 2019-July 2022 (mmHg);
 - f. Provide an estimate of the amount of hours the parts washer is used on a monthly basis;
 - g. Indicate whether any of the solvents used are listed in the definition of halogenated hazardous air pollutant solvent in 40 C.F.R. § 63.461 and contain >5% by total weight in their application.