

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N087946949

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| FACILITY: Morgan Olson, LLC | | SRN / ID: N0879 |
| LOCATION: 1861 CENTERVILLE ROAD, STURGIS | | DISTRICT: Kalamazoo |
| CITY: STURGIS | | COUNTY: SAINT JOSEPH |
| CONTACT: Carrie Perry , EHS Manager | | ACTIVITY DATE: 11/14/2018 |
| STAFF: Dennis Dunlap | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: MAJOR |
| SUBJECT: Scheduled inspection. | | |
| RESOLVED COMPLAINTS: | | |

This was an unannounced inspection. Carrie Perry is the contact person with an office at the Centreville (Plant 1) location. Morgan-Olson has more than 900 employees. Plant 5 (Nottawa) has 2 shifts 5 days per week. Plant 1 has one shift five days per week. Morgan-Olson builds delivery trucks such as those for UPS.

PLANT 5 NOTTAWA

This facility is on Nottawa Street. This is the truck building area. The truck construction begins with a truck chassis. The truck body is built upon the chassis. This involves metal fabrication and welding activities mainly with aluminum. Welding is exempt by Rule 285(2)(I). Metal fabrication activities are mainly exempt by Rule 285(2)(I)(I) and 285(2)(I)(vi)(B). Sealants and adhesives are used here. These are covered in Rule 290 groups (EUSealant and EUMisc-VOC). The truck bodies are wiped down to remove excess sealants and adhesives. Solvent Blend 44 and isopropyl alcohol are used. These are obtained from a bulk container and transferred to small red drums or plastic spray bottles. Rags and paper towels are used for wiping down the truck bodies. Rags are disposed of in closed red drums. The hand wiping operation is covered in the ROP in EUP5WIPE. When construction is complete the trucks are taken to Plant 1 for painting and finishing. The windshield wiper washer container is filled with washer fluid which may contain methanol. This operation may be exempt by Rule 284(2)(I). In the recordkeeping this appears as EUWINWASHER as a Rule 290 group. This 290 group is not in the ROP.

PLANT 1 CENTREVILLE

When trucks are first brought over from Nottawa (Plant 5) they are wiped down with 3900 S, isopropyl alcohol, or solvent blend 44. This hand wiping operation is covered in the ROP as EUCEWIPE. Acetone is not used. The trucks are then washed, dried and prepared for painting by masking. There are two prime coat booths, each with one stack. The filters are changed each shift. One type of primer is used. No catalyst is used. The primer takes about 25 minutes to dry.

There are two topcoat booths. Booth 1 has one stack and Booth 2 has two stacks. The filters are changed each shift. Topcoat is sprayed from 5 gallon drums. A catalyst is used. Paint waste is stored in a 55-gallon drum. The SDS's for two coatings were obtained. These were for UPS Brown and Imron White. According to the SDS's the material limit in the ROP (3.5 lb/gal minus water and exempt solvents) was exceeded. This will be included in a Violation Notice (VN). There is also a condition in the ROP pertaining to testing coatings by Method 24. This has not been done and will be included in the VN.

The drying oven is kept at temperatures ranging between 157-162 degrees F. The permit limit is 194. There is an O & M Plan for the oven. Spray guns are cleaned in gun cleaning stations maintained by Heritage Crystal Clean. At least three of these stations have a duct coming out of the top that appear to have access to outside air. This is not in accordance with Special Condition There is also a cold cleaner in the shop area that was not seen.

There is a small parts booth for small parts like bumpers and battery box lids. It has one stack. There are two touch-up areas after painting. EUP1TUBooth1 has a designated area. EUP1TUBooth2 is a general area. EUFinal is a mobile touch-up apparatus that was not seen.

After painting the trucks may go to an undercoat booth. Two types of undercoat are used. A special one is used for UPS trucks. Filters are changed weekly. There are two stacks.

The topcoat stacks, prime coat stacks, and undercoat stacks were viewed from outside. No visible emissions were seen. Outside there is a 1,000 gallon gasoline tank and 500 gallon diesel tank used to dispense gasoline to the trucks. These tanks are exempt by Rule 284(2)(g)(ii). There are also a 1,000 gallon and 1,200 gallon propane tanks used to fuel forklifts. These are exempt by Rule 284(2)(b)

RECORDKEEPING

EUP1UBOOTH (Undercoat Booth). 12-month rolling time period VOC emissions through Sept. 2018 are about 13.5 tons, in compliance with permit limit of 32.0 tons. Acetone is not used. It appears that two kinds of undercoating are used- Z-guard 8000 and Z-guard 20060B. The material limit in the ROP is 2.5 pounds per gallon minus water and exempt solvents as applied. It does not appear that these have VOC or exempt solvents. According to the SDS the VOC content is 2.4 pounds per gallon. The material VOC would be the same because there are no exempt solvents or water.

EUCEWIPE (Plant 1 hand wiping operations). 12-month rolling time period VOC emissions through Sept. 2018 are about 14.5 tons, in compliance with permit limit of 32.8 tons. Acetone is not used.

EUP5Wipe (Plant 5 hand wiping operations). 12-month rolling time period VOC emissions through Sept. 2018 are about 5.5 tons, in compliance with permit limit of 14.2 tons.

Prime coat booths (FGCoating). 12-month rolling time period VOC and acetone emissions through Sept. 2018 are about 13.0 tons, in compliance with permit limit of 66.0 tons.

Topcoat booths (FGCoating). 12-month rolling time period VOC and acetone emissions through Sept. 2018 are about 26.34 tons, in compliance with permit limit of 77.5 tons.

FGCoating. The monthly VOC and acetone recordkeeping sheets appear to include the VOC and acetone emissions for the prime coat booths, the top coat booths, and the touchup booths. 12-month rolling time period VOC emissions through Sept. 2018 are about 39.32 tons, in compliance with permit limit of 103.8 tons.

EUP1Parts1 (Small parts booth). Paint use under 100 gallons per month in compliance with 425 gallon/month permit limit.

EUP1TUBooth1, EUP1TUBooth2, EUFinal (touch-up operations). Combined paint usage under the 425 gallon/month limit.

FG-MACT-MMMM and FG-MACT-PPPP. Semiannual reports certify that the facility is in compliance.

FGCold Cleaners. Some spray gun cleaners are vented to the outside, thus, not having a closed lid when parts are not being cleaned. This will be included in the VN.

EUSealant (Rule 290). Monthly emissions appear to be under 1,000 pounds per month.

EUMisc-VOC (Rule 290). The 1,000 pound per month emission limit appears to have been exceeded in Oct., Nov., and Dec. of 2017, and Feb., Apr., May, June, July, and Aug. of 2018. This will be included in the VN. The chemical N,N-Dimethyl Aniline has an IRSL of 0.085 which limits emissions to under 20 pounds per month. This amount was not exceeded.

In summary, the VN will include the EUMisc-VOC emission exceedances, the material limit exceedances for the top coat booths, the venting of the cold cleaners, Method 24 testing, and General Condition 17 of the ROP because some records were not readily available.

NAME Dennis Dunlap

DATE 12/11/18

SUPERVISOR MD 12/11/2018