

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

N334624710

FACILITY: Midwest Bus Corp. Aiken St. plant (was Vaungarde)		SRN / ID: N3346
LOCATION: 1070 AIKEN RD, OWOSSO		DISTRICT: Lansing
CITY: OWOSSO		COUNTY: SHIAWASSEE
CONTACT: Michael Huff , Technical Services & Training		ACTIVITY DATE: 03/28/2014
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-initiated inspection of facility, and discussion of how to determine facility's Potential to Emit.		
RESOLVED COMPLAINTS:		

On 3/28/2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Midwest Bus Corp.'s Aiken Street facility.

Environmental contacts:

Michael Huff, Technical Services and Training; 989-723-5241 ext. 853; mikeh@midwestbus.com

George Gunn, Director of Operations; 989-729-5866; georgeg@midwestbus.com

Facility description:

Midwest Bus, as explained on their website, is the largest re-manufacturer of city transit buses in the United States. This is their newest plant, and they perform some renovation of buses here, including repainting. They also assemble bike racks here, and store them.

Emission units:

Emission units	Control equipment	Relevant exemption	Operating status, at time of inspection
Large paint booth	Mat/panel filters	Rule 287(c)	Not operating

Regulatory overview:

The Potential to Emit (PTE) for this facility is currently unknown. PTE is the maximum amount of regulated air contaminants a facility could emit if each emission unit operated at its maximum design capacity 24 hours per day, 365 days per year, using the highest emitting materials at the site, with air pollution control devices turned off. PTE is generally much higher than what a facility actually emits, over the course of a year.

The PTE is used to determine if a facility is classified as a major or minor source of air contaminants. For criteria pollutants (carbon monoxide, nitrogen oxides, sulfur dioxides, volatile organic compounds, lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns), a major source is one where the PTE for any single air contaminant is 100 tons per year (TPY) or more. For Hazardous Air Pollutants (HAPs), a major source is one where the PTE of a single HAP is greater than 10 TPY, or the PTE of all HAPs combined is 25 TPY or greater. The PTE for this facility needs to be determined for both criteria pollutants and HAPs, to determine whether they are major or minor, and if any additional regulations apply.

Recent history:

This site was formerly owned and operated by Vaungarde, and had closed some years ago. Midwest Bus recently purchased it, and refurbished the facility. They have 10 employees here.

Location:

This facility is in an industrial park on the outskirts of Owosso. Within a several hundred foot radius, there are a number of small industrial establishments to the west, north, and south. There is also a county government office to the west. To the east is primarily undeveloped land, with some industrial

property. There are some scattered residences to the east, and southeast, most of them at least 500 feet distant.

Arrival:

This was not an unannounced inspection. I had tried to conduct an unannounced inspection of the Midwest Bus facilities in Owosso earlier this week, on 3/24, but plant staff were unavailable. We agreed upon today's date, for the inspections of their sites. The main offices of Midwest Bus are at the site of their Rebuilding Division, at 1940 West Stewart Street, in Owosso. I went to that location first. I provided Mr. Huff with a copy of the DEQ brochure "Environmental Inspections: Rights and Responsibilities." After we conducted an inspection of that site, documented in a separate activity report, we came here, to the Aiken Street plant.

Inspection:

When we arrived, I could not see any visible emissions, nor detect any odors from the Aiken Street plant.

They assemble bike racks here, and store them. Their bike racks are installed on transit buses across the United States. The minor assembly processes did not appear to be sources of air emissions.

They renovate buses for transit agencies, but generally do not do just minor repair work on them. A few of the refurbished buses which they lease to transit agencies were here. They are in a black and white paint scheme, and the leasing customer simply applies a decal to a bus, to identify it as part of their fleet.

Paint booth; Rule 287(c):

At present, they might paint 10 buses per year at the Aiken Street plant. They typically use less than 5 gallons of paint per month. A Capital Area Transportation Authority (CATA) bus was being prepared for painting, at the time of the inspection. It is one of eight CATA buses which will be processed here. They handle their smaller bus contracts here, and the larger ones at the Stewart Street plant.

The paint booth was very modern, and is equipped with a sprinkler system for fire suppression. It uses mat/panel filters for particulate control. The filters are replaced as needed, rather than on a set schedule, because it is used so infrequently. This booth is used for both priming, and for top coats.

For each bus, they have a paint kit, which includes information on the types and amounts of coatings to be used. After the inspection, on 4/28, I e-mailed Mr. Huff, to request an example of a month's worth of paint records, for each paint booth at this site, to verify compliance with Rule 287(c)(iii), which requires that monthly coating use records be maintained on file, and made available upon request.

I calculated a preliminary estimate of their PTE, based upon a hypothetical worst case scenario, with a volatile organic compound (VOC) content of 7.63 lbs/gallon, and 200 gallons of coating use per month, as follows:

$$7.63 \text{ lbs VOC/gal} \times 2,400 \text{ gallons per year} \times 1 \text{ ton}/2,000 \text{ lbs} = 9.16 \text{ tons}$$

This hypothetical calculation indicates that the facility should not be a major source for VOC emissions. If the entire volatile content of the coatings consisted of a single HAP, the facility would be slightly below the 10 TPY threshold for a single HAP, and below the 25 TPY threshold for aggregate (combined) HAPs.

Conclusion:

I could not find any instances of noncompliance with air regulations during the inspection of the Aiken Street facility. Mr. Huff was very helpful and cooperative. The potential to emit for the facility will need to be determined, however, to determine whether this facility is a major source of minor source of air emissions, and to see if there may be any additional air requirements which might apply.

On 4/22, I e-mailed to Mr. Huff the URL for the DEQ Potential to Emit Workbook, and provided contact information for Ms. Anita Singh, Environmental Compliance Specialist with the DEQ's Office of

Environmental Assistance. Ms. Singh will contact Mr. Huff, to provide any needed guidance as Midwest Bus determines their Potential to Emit for the Rebuilding Division, Aftermarket Parts Division, and their Aiken Street facility.

As previously noted in this report, on 4/28, I e-mailed a request to Mr. Huff for one month's worth of coating use records for the paint booth. These records will be reviewed, upon receipt.

NAME *[Signature]*
BSE,

DATE 5/2/2014

SUPERVISOR *[Signature]*