DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

A083046960		
FACILITY: FLEET ENGINEERS INC		SRN / ID: M0830
LOCATION: 1800 E KEATING, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: Mark DeWitt , Human Resources Manager		ACTIVITY DATE: 11/13/2018
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY'19 on-site insperegulations.	ection to determine the facility's compliance status with	respect to applicable air quality rules and
RESOLVED COMPLAINTS:		

Chris Robinson (CR) from the Air Quality Division conducted a scheduled unannounced inspection of Fleet Engineering Inc. located at 1800 East Keating Street in Muskegon, Muskegon County, Michigan on November 13, 2018. The purpose of this inspection was to determine this facility's compliance status with respect to applicable Air quality rules and regulations. CR met with Mr. Mark DeWitt, Human Resources Manager, immediately announcing intent of the visit and providing proper identification. The inspection was conducted from approximately 10:00 am to 11:15 am.

Weather conditions were approximately 28°F with north winds at 9mph and light snow (<u>www.weatherunderground.com</u>). A very slight warm plastic odor was observed on the south side of the main building along Keating street. The source of the odors remains unknown but did not seem to originate from any of the buildings owned and operated by Fleet. No visible emissions were observed. To date the AQD has not received any recent odor complaints for this area.

Equipment at this facility are operated under Rule 201 Permit exemptions. Fleet manufacturers various components for commercial trucks and trailers, such as mud flaps and mounting hardware as well as overhead roll-up doors and mounting hardware. Operations at the facility include metal working, wood working and plastic injection. The metal working equipment is primarily used for stamping, bending, drilling and forming which are exempt from Rule 201 permitting requirements under Rule 285(2)(I)(vi)(B). Fleet also has several automated and manually operated welders which are exempt from Rule 201 permitting requirements under Rule 285(2)(i). Within approximately the last Five (5) years, Fleet has installed two (2) plastic mold injection machines for producing such things like mud flaps. Scrap plastic from this process is ground and collected using a small internally vented cyclone with an attached fabric filter. The material collected by the cyclone is recycled. The plastic injection equipment is exempt from Rule 201 permitting through Rule 286(2)(b) and the grinding of waste plastic for recycling is also exempt per Rule 285(2)(I)(vi)(B).

The woodworking equipment consists of various saws and routers which either exhaust through a small internally vented dust collector or through an externally vented baghouse located outside on the West end of Plant 2. The wood working activities are also exempt per Rules 285(2)(I)(vi)(B) for emissions released only to the in-plant environment or 285(2)(I)(vi)(C) for externally vented emissions controlled by an appropriately designed and operated fabric filter collector. Collected saw dust is stored in a bin under the dust collector located outside. The bin lid was closed and the area appeared to be clean and well maintained.

One spray booth is utilized for coating the roll-up door panels with paint, which was not operating at the time of this inspection. Mr. DeWitt indicated that the booths or operated under Rule 287(2)(c), which requires the use of either dry filter control or a water wash system and a usage of no more than 200 gallons per month. Filters appeared to be installed and maintained properly. Records were provided, which are attached, confirming usage is well under 200 gallons per month. Approximately 147.05 gallons of paint were used thus far in 2018 with a monthly maximum of 20.23 gallons used in August.

The plastic mold injection process utilizes a spray mold release compound. The guidance document for Rule 286 suggests that mold release is included in this exemption because expected VOC's are minimal due to infrequent and sparse use of the release compound. Also, the facility uses approximately one (1) case every two (2) months. Each case contains twelve (12), twelve (12) ounce hand held spray cans. Six (6) cans per month is, at most, approximately 1.13 gallons and Rule 287(2)(c) exempts surface coating operations with a usage of no more than 200 gallons per month. A safety data sheet for the mold release is attached.

Fleet also has one non-agitated and non-heated cold cleaner exempt from Rule 201 Permitting under Rule 281 (2)(h) for cold cleaners with an air/vapor interface of no more than 10 square feet.

Based on facility records, documentations and observations made during the on-site inspection, Fleet Engineering Inc., appears to be in compliance with applicable air quality rules and regulations.

NAME

DATE /2/1/20

SUPERVISOR