

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

M425930345

FACILITY: Midwest Bus Rebuilding Division, Midwest Bus Corp.	SRN / ID: M4259
LOCATION: 1940 STEWART, OWOSSO	DISTRICT: Lansing
CITY: OWOSSO	COUNTY: SHIAWASSEE
CONTACT: Michael Huff , Technical Services & Training	ACTIVITY DATE: 07/23/2015
STAFF: Nathaniel Hude	COMPLIANCE STATUS: Compliance
SUBJECT:	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

Inspection Report

M4259- Midwest Bus Corporation
1940 Stewart St, Owosso, Michigan 48867

Inspection Date:

7/23/15

Facility Contacts:

George Gunn, Director of Operations, 989-729-5866, georgeg@midwestbus.com
Timothy Rudolph, General Counsel, 989-729-5891, timr@midwestbus.com
Michael Huff, Technical Services and Training, 989-723-5241 ext. 853, mikeh@midwestbus.com
Ron Roach, Health and Safety

MDEQ AQD Personnel:

Nathan Hude – 517-284-6779, huden@michigan.gov

Facility Description:

Midwest Bus re-manufacturers transit buses. They commonly contract with bus owners for refurbishing buses with new motors, rebuilt axels, new or cleaned interiors, and new paint jobs. The cost of refurbishment is 2/3rds the cost of a new bus or less. Midwest Bus currently has a contract with SMART for the refurbishment of 190 buses over a 2 year period and the University of Washington for 3-4 buses. All buses are required to be replaced or refurbished every 10 years in accordance with Transit Authority rules.

Applicable Regulations:

PTI 402-85 for two paint spray booths
PTI 403-85 for sandblasting operation
Exemption Rules 285 (l)(vi)(B) and 287 (b) and (c)

Previous Inspections:

11/09/2011, Dan McGeen, No Violations
3/28/2014, Dan McGeen, No Violations

Inspection Key Concerns:

1. Permit 403-85 is no longer valid due to modification of sand blasting bay into a contained washing bay
2. Permit 402-85 is no longer valid due to exemption 287 (c) which was written in 1993 (after the permit issuance) and allows for up to 200 gallons of per month on a coating line.

Permit Unit Summary Tables

None

Unit Identification

Emission units	Control equipment	Relevant exemption	Operating status, at time of inspection
Portable sanders	Portable vacuum filtration units	Rule 285(l)(vi)(B)	Compliance

Metal fabrication activities		Rule 285(l)(vi)(B)	Not operating
Auto body repair room		Rule 285(l)(vi)(B)	Not operating
Welding		Rule 285(i)	Not operating
Two large paint booths	Mat/panel filters	Rule 287(c)	Compliance
Small paint booth for parts	Mat/panel filters	Rule 287(c)	Not operating
Spray cans, used in small paint booth	Mat/panel filters	Rule 287(b)	Not operating
3 used oil heaters		Rule 282 (b)(iv)	Not operating

MAERS Reporting

None

Inspection Summary

This was an initial contact (as the new AQD inspector), unannounced inspection. Upon arriving at the facility I did not smell or see anything that was of environmental concern. The site had an inspection in 2014, yet was on the list for this year's inspections. The 2014 inspection did not reference permits 402-85 or 403-85, so it is assumed that they were unknown to exist at that time. Part of the intent of my inspection was to see if the permits were still valid and to void if they did not apply.

I arrived onsite at approx. 0830 and went into the front office. I asked for a Michael Huff while introducing myself and explaining the intent of my visit. Michael met me in the lobby and we went back to his office. I provided him with a copy of the inspection brochure and my business card while discussing the intent of my inspection.

I informed Michael that I had found 2 permits applicable to their site, and that I did not believe they would still be valid. He informed me that they did not have a sandblast bay anymore due to the new composite material being used for buses. I explained to him that permit 403-85 should then be voided. I also explained to him that an exemption for painting was written after the issuance of their paint booth permit, and permit 402-85 could then be voided depending on their usage rates.

After our discussion, Michael and I toured the facility. As we walked he informed me of the process; initially when buses arrive, they are inspected, washed, drivetrains are rebuilt, and engines are replacing followed by painting and interior cleaning/replacement. Most of the older engines are not EPA certified, thus must be replaced with newer Cummins engines.

At our first stop, I observed employees sanding a bus body. The sanders contained the dust through a vacuum system well enough that I did not see dust in the air. We then went to the wash rack that replaced the sandblasting area. The wash rack is a closed loop system with filters for cleaning the water. We then continued to the drive train area where the axels are rebuilt and new brakes are installed. The paint booths were the next stop. Both booths are large enough to contain the entire bus. An exhaust system is installed and filters are in place. Michael and the painters informed me that they could paint on average 2 buses per week; most of the timing is due to the dry time.

At this point, we went back to Michael's office to review usage documents. He provided me with a copy of an order sheet they use for each bus. In general, they use up to 16.5 gallons of VOC containing material per bus. The maximum VOC density on the product sheets they provided is 7.13 lbs/gallon of VOC's.

Using these factors, I can safely assume they are under the significant limit of 40 tons/year maximum per rule 336.1119(e).

$16.5\text{gal} * 7.13\text{ lbs VOC/gal} * 2\text{ buses/week} * 52\text{ weeks/yr operating} / 2000\text{lbs} = 6.12\text{ tons/yr VOC's}$

I can safely assume they are under the rule 287 (c) which allows for up to 200 gallons of per month on a coating line. This calculation is considering all VOC containing material as paint and thus the actual number is lower.

$16.5\text{gal} * 2\text{ buses/week} * 4\text{ weeks/month} = 132\text{ gallons}$

Based on their limiting factor of giving the paint time to dry and the need for some buses not to require a paint job, this result is well under the rule 287 (c) limits.

Prior to departing, I discussed the permits and the need to void them with Timothy Rudolph. I provided him with a copy of permits 402-85 and 403-85, the exemption booklet, and a copy of the "Procedure for Voiding Permits to Install" dated June 7, 1999.

I left the site around 0945 after finding no concerns.

NAME *[Signature]*

DATE 7/24/15

SUPERVISOR *B.M.*

