

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

N059825538

FACILITY: PADDLE WHEELER DIV. OF OWOSSO COMPOSITE LLC		SRN / ID: N0598
LOCATION: 403 S STATE ST, OWOSSO		DISTRICT: Lansing
CITY: OWOSSO		COUNTY: SHIAWASSEE
CONTACT: Diane Gagnier , Owner		ACTIVITY DATE: 06/04/2014
STAFF: Brad Myott	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Partial Compliance Evaluation (PCE) activity: unannounced, scheduled inspection, conducted as part of a Full Compliance Evaluation (FCE). Determine compliance with PTI 55-07.		
RESOLVED COMPLAINTS:		

On 6/4/2014, I conducted an unannounced, scheduled inspection of Owosso Composites, Paddle Wheeler Division. This was conducted as a Partial Compliance Evaluation (PCE) activity, part of a Full Compliance Evaluation (FCE).

Facility description:

This facility manufactures fiberglass paddle boats, and fiberglass parts which are used by other manufacturers in their pontoon boats. The facility has a gel-coat booth, a light resin transfer molding process, and an open molding process.

Regulatory background:

This facility is considered to be a synthetic minor source, because it has an opt-out permit, which limits its Potential to Emit. This prevents the facility from becoming a major source, which would require a Renewable Operating Permit. The opt-out permit is Permit to Install (PTI) No. 55-07. The facility is not subject to either the NESHAP for Boat Manufacturing (Subpart VVVV) nor Reinforced Plastic Parts Production (Subpart WWWW) because the facility is not a major source of HAPs.

I arrived at 1:30 p.m. with Michelle Luplow. There were no odors detectable in the parking lot of the facility. Weather conditions were rainy, and 75 degrees F. We met with Ms. Diane Gagnier, President. I provided her with a copy of the DEQ environmental inspections brochure and she agreed to show us around the facility.

Business has been steady. The company continues to make their traditional paddleboats along with the newer swan paddleboat design. The newer paddleboat design is a bit larger than their traditional boats. Although they have the newer boat design, they are still using all the same process equipment, from the gelcoat booth to the chop room, to the same metal part fabrication. We conducted an inspection of the facility, as detailed below.

Emission Unit	Description	Compliance
EUOPENMOLDING	one dry filter spray booth and a non-atomized applicator for application of resin to make fiberglass boat parts and small components for boats. Catalyst materials used with open molding resin materials.	no
EURTM	Resin transfer molding (RTM) operation to manufacture boat(s) and boat parts. Catalyst materials used with RTM resin materials.	yes
EUGELCOAT	One dry filter spray booth and non-atomized applicator for the application of gelcoat materials to make fiberglass boat parts and small components for boats. Includes gelcoat used in the RTM activities. Catalyst materials used with gelcoat.	no

Gelcoat spray booth with panel filter, PTI No. 55-07:

The first coat sprayed into the mold is the layer that the public will actually see, on the upper surface of the boat. For solid colors, it is simply a color coat. For metallic colors, they first begin with a clear coat, and then apply a color that has been mixed with polyflake. After the metallic coating has dried, black is applied, in case there are any thin spots in the color/polyflake layer.

The gelcoat spray booth was operating, during the inspection. A white coating was being applied. The mat/panel filters were in place, to catch particulates. We stepped outside the facility, and saw that there were no visible emissions from the booth's exhaust stack. Additionally, there were no signs of particulate matter being deposited on the exhaust stack. We could not smell any odors outside.

Open molding, with chop gun spray equipment and panel filter, PTI No. 55-07:

The open molding equipment is in the chop room. Three of the four mat/panel filters were in place, and Diane said they would replace the missing filter. The open molding process was in use, during the inspection. From outside of the plant, we could not see any visible emissions from the exhaust stack, and there were no signs of particulate matter being deposited onto the stack itself. We did not detect any odors outside the facility.

Resin transfer molding (RTM), PTI No. 55-07:

The light RTM process uses closed molds. It was not running, at the time of the inspection. This is a closed mold process that uses male and female molds and has lower emissions of styrene than the open molding process. This process usually operates 1-2 hrs each day and uses mats of fiberglass inside the mold. A vacuum pulls out resin during the process.

Following the inspection we drove around the facility and did not detect any odors in the area.

Emission Records

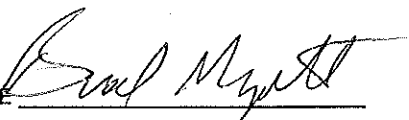
Part of a Full Compliance Evaluation, for synthetic minor sources, is a review of the facility's recordkeeping for material throughput rates, and emissions. Ernie Campbell does the emission calculations for the company. He was not on site during my inspection but Diane said he could email me their usage and emission records. I later contacted Ernie and he agreed to send me emission records through May 2014, see attached.

The emission factors utilized by Paddle Wheeler are derived from the Unified Emission Factor (UEF) table which is Appendix A of the facility's opt-out permit, Permit to Install (PTI) No. 55-07. The facility's Permit to Install, No. 55-07, limits VOC emissions from the flexible group FGFIBERGLASS to 8.9 tons per year (this flexible group includes EUOPENMOLDING, EURTM, EUGELCOAT, and EUCLEANUP). The total 12-month rolling VOC emissions through May 2014 are 4.9 tons, well below the permitted limit. Most of these VOC emissions are considered styrene which is a HAP. The HAP limit for any single HAP is 9.0 TPY, thus the styrene emissions are below this limit as well. Acetone emissions are well below the 20 tpy permit limit.

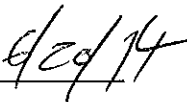
PTI 55-07 also restricts the styrene and MMA content of materials used in the gelcoat, RTM and open molding process. According to the recordkeeping provided by Owosso Composites it appears that some of the coatings used in EUGELCOAT are above the allowable content limits for styrene and MMA and some of the coatings for EUOPENMOLDING are above the styrene content. Specifically the content limits in special conditions 1.2, 1.4 and 1.5 are not being met.

The facility appeared to be in compliance with PTI No. 55-07 except for the material content exceedances discussed above. Therefore a violation notice will be sent to the company requesting them to address this issue.

NAME



DATE



SUPERVISOR

