

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

N059843518

FACILITY: PADDLE WHEELER DIV. OF OWOSSO COMPOSITE LLC		SRN / ID: N0598
LOCATION: 403 S STATE ST, OWOSSO		DISTRICT: Lansing
CITY: OWOSSO		COUNTY: SHIAWASSEE
CONTACT:		ACTIVITY DATE: 03/02/2018
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Attempt to inspect facility, which is now closed, and for sale.		
RESOLVED COMPLAINTS:		

On 3/2/2018, the Michigan Department of Environmental Quality attempted to conduct an unannounced, scheduled inspection of Paddle Wheeler Division of Owosso Composites, but this facility appeared to be closed. At a later date, AQD conducted an audit of the Michigan Air Emissions Reporting System (MAERS) report submitted by the company for the 2017 operating year. The attempted inspection and the review of facility recordkeeping and reporting were each Partial Compliance Evaluation (PCE) activities, conducted as part of a Full Compliance Evaluation (FCE).

**Environmental contact:**

Diane Gagnier, Operations Manager; 800-367-3057 or 989-723-8997; [dianeg@nationalcomposites.com](mailto:dianeg@nationalcomposites.com)

**Facility description:**

This facility, which appeared to be vacant and closed, manufactured fiberglass paddle boats, and fiberglass parts which were used by other manufacturers in their pontoon boats. The facility had a gelcoat booth, a light resin transfer molding process, and an open molding process.

**Emission units:**

Emission unit	Description	Controls, if any	Permit No., or exemption rule	Compliance status
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 use in the RTM activities. Catalyst materials used with gelcoat.	Particulate filters	55-07A	Not operating
EURTM	Resin transfer molding (RTM) operation to manufacture boat(s) and boat parts. Catalyst materials used with RTM resin materials.	Closed molds	55-07A	Not operating
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.	Particulate filters	55-07A	Not operating
Trim booth	Booth in building where 90% of grinding, cutting, and drilling is performed on resin parts, exhausted outdoors	Pending	Rule 285(l)(vi)(C)	Not operating
Grinding, cutting, drilling, and finishing of resin parts	Large open area where various finishing activities are conducted, exhausts to in-plant environment	None	Rule 285(l)(vi)(C)	Not operating
Adhesive use	Application of adhesive to adhere metal parts to resin parts	None	Rules 287(a) and/or (c)	Not operating

**Regulatory overview:**

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

**Fee status:**

This facility was not considered fee-subject, for the following reasons. Because it was not a major source for criteria pollutants, it was not classified as Category I. Additionally, because it was not a major source for Hazardous Air Pollutants (HAPs), and was not subject to federal New Source Performance Standards, it was not classified as Category II. Finally, because it was not subject to federal Maximum Achievable Control Technology standards, it was not classified as Category III. The facility was required to submit an annual air emissions report via MAERS, which they did for the 2017 operating year, discussed later in this report.

**Location:**

This facility was located near residential and commercial properties, within Owosso. Based on satellite images, the nearest residences were located approximately 150 feet to the west of the facility, and about 400 feet to the northeast. Commercial properties were located due north and east of the facility. To the south was a commercial or industrial structure, but there were no residences for at least 500 feet.

**Recent history:**

No air pollution complaints have been received regarding this facility, since 1999. PTI No. 55-07 was revised, in 2014, to PTI No. 55-07A, which allowed for changes in VOC content of some raw materials. Per recent discussion with AQD inspector Julie Brunner, it appeared that Paddle Wheeler may have vacated its State Street site, and relocated process equipment to the site of Owosso Composites, on Delaney Street in Owosso. Owosso Composites has the State Registration Number (SRN) N2430.

**Partial Compliance Evaluation activity No. 1: inspection:**

I arrived at 2:37 PM, at the entrance to the site. Weather conditions were mostly sunny, 41 degrees F, and calm. Neither odors nor visible emissions could be detected coming from the facility.

The facility appeared closed, I saw upon arrival. Gates in the site's chain link fence were shut, and secured with a lock and chain. There was a for sale sign on the fence, and an adjacent sign indicated that Paddle Wheeler had moved to Owosso Composites. Please see attached photos.

I left the site at 2:44 PM.

The opt-out PTI No. 55-07A was subsequently voided, per my request, on 3/14/2008.

**PCE No. 2: review of facility recordkeeping:**

Recordkeeping was reviewed, in the form of the annual MAERS report for the 2017 operating year. I audited the report on 5/24/2018.

The reported emissions of 2.55 tons VOC were less than permit limit of 8.9 TPY VOC. The reported styrene emissions of 2.50 tons were less than permit limit of <9.0 TPY HAPs.

**Conclusion:**

No instances of noncompliance were observed during the attempted inspection. The limits in the opt-out PTI No. 55-07A appeared to be met, based upon an audit of the MAERS report for the 2017 operating year. PTI No. 55-07A was voided by the Permit Section on 3/14/2018. All production activity at the site by this company appears to have ceased.



**Image 1(001)** : Locked gates at site entrance.



**Image 2(002)** : Signs on fence.



**Image 3(003) :** Sign, close up.

NAME *[Signature]*

DATE *6/19/2018*

SUPERVISOR *B.M.*