

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

N087941017

FACILITY: Morgan Olson, LLC		SRN / ID: N0879
LOCATION: 1861 CENTERVILLE ROAD, STURGIS		DISTRICT: Kalamazoo
CITY: STURGIS		COUNTY: SAINT JOSEPH
CONTACT: Eugene Yoder, Director of Operations		ACTIVITY DATE: 08/08/2017
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

This was an unannounced inspection. Eugene Yoder is the contact person. The facility employs 860 employees and operates two shifts 5-6 days per week. The inspector for AQD was Dennis Dunlap. The facility receives truck chassis and assembles delivery trucks such as UPS, Purolator, Postal Service vehicles.

There are two plants: Nottawa, where the main office is located; and Centreville, where final assembly occurs.

NOTTAWA PLANT

In this plant, most the metal fabrication takes place. Truck chassis are received which includes the cab, engine, transmission, and rear wheels. The truck body is then added from the fabricated parts. Sealant is used here and is part of the Rule 290 group EUSealant. Isopropyl alcohol (IPA) and Solvent Blend 44 are used here to wipe down the truck bodies and remove excess sealant and is in the emission unit EUP5Wipe. The metal fabrication is exempt by Rule 285(2)(l)(I) and (vi)(B). Welding is exempt by Rule 285(2)(l).

Solvent Blend 44 is at work stations in red cans. These are kept closed when not in use. IPA is generally in plastic bottles. Used rags are disposed of in drums in which the lid is kept closed.

One cold cleaner was seen in a shop area. The lid was closed and rules were posted.

CENTREVILLE PLANT

After being assembled the trucks go to the Centreville Plant. The trucks are first wiped down. The solvents used here are Solvent 3900, Solvent 4400, and IPA. This is in the emission unit EUCEWIPE. The trucks then go through a wash where Allodyne used.

The trucks are then prepared for painting which includes masking. There are two primer booths, small and medium. There are about 3 primers that are used. An activator is added to the primer. No reducers or thinners are added. The primer can dry for about 22 minutes before going into the topcoat booth.

There are two topcoat booths. Activator and catalyst are added to the topcoat. No thinners or reducers are added.

The filters are changed every shift. The guns are cleaned with crystal clean. The guns are cleaned by placing them in a closed container in which crystal clean is circulated. The crystal clean is obtained from a drum that is under the container and connected to the container by a hose. The waste crystal clean is picked up every two weeks. There are at least two of these gun cleaning stations.

After applying the topcoat, the trucks go into an infrared oven set at 165 degrees. The oven will shut off at 180 degrees. There is a temperature readout. The maximum temp. for the oven in the ROP is 194. There is an oven O & M Plan.

The pressure going into the guns was checked. This was 63 psi.

Primer and topcoat use is measured by recording each drum that is checked out. It is assumed that each drum checked out is used.

There are 4 other booths or areas where paint is applied: these are the small parts booth for small parts; two touch-up areas for touch-up after the trucks are painted; and a final touch-up area. The VOC emissions for these areas are included in FGCoating. The gallons of paint used is kept separately for the small parts booth and combined for the touch-up areas. There is a permit limit in the ROP for the gallons used in these areas.

The facility was issued a renewal ROP on April 5, 2017. There is a requirement in the ROP to test coatings using Method 24 on a yearly basis. This needs to be done by April 5, 2018.

The trucks may receive decals. The paint used here is 3M Primer 94. There is a gasoline and diesel loading area outside. This is exempt by Rule 284(2)(g). Each vehicle receives about 5 gallons of fuel. Windshield washer fluid is also added. It may contain methanol. This is exempt by Rule 284(2)(l).

No visible emissions were seen coming from the stacks when viewed from outside.

Most of the trucks receive undercoat at the undercoat booth (EUP1UBOOTH). There may be 3 different undercoats used. Z-guard is a solvent-based undercoat. It is not thinned prior to use. It meets the permit limit of 2.5 pounds of VOC per gallon minus water as applied. Filters are changed twice per week in the booth.

Semi-annual compliance reports are sent to the District Office for the MACTS MMMM and PPPP. According to these reports the facility is in compliance with the MACTS.

Records could not be viewed at the time of the inspection. This was because a staff person had recently left the facility and time was needed to find the electronic records. The records were emailed by Melisa VanNuys. The records were requested for the time period 6/16 to 6/17. The records were complete and up to date. The facility was in compliance with all emission limits.

The records reviewed included those for the two Rule 290 groups, the undercoat booth, EUCEWIPE, EUP5Wipe, and FGCoating.

The Rule 290 recordkeeping includes a breakdown of the toxics for each month. One toxic (dimethylaniline) has a low IRSL (0.085) but it appears that very low quantities are released (less than one pound per month).

There is a Rule 290 group (EUMisc-VOC) for VOC containing materials not covered elsewhere.

NAME Dennis Dunlap DATE 8/24/17 SUPERVISOR mb 8/25/2017