

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

N110737738

FACILITY: Freedom Truck Parts		SRN / ID: N1107
LOCATION: 1100 INDUSTRIAL AVENUE, ALBION		DISTRICT: Kalamazoo
CITY: ALBION		COUNTY: CALHOUN
CONTACT: Stephanie Frederick , Facility Liaison		ACTIVITY DATE: 11/09/2016
STAFF: Rex Lane	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self Initiated Inspection		
RESOLVED COMPLAINTS:		

On November 9, 2016, MDEQ-AQD staff arrived at Freedom Truck Parts (fka High Colors) at 11:45 am to conduct an unannounced air quality inspection. Staff made contact with Ms. Stephanie Frederick, Facility Liaison and stated the purpose of the visit and provided her with a business card. Staff asked Ms. Frederick about the name change and she indicated that it became Freedom Truck Parts (hereafter facility) in December 2015 and their parent company is Haas Trucking located on the east side of the City of Albion.

Ms. Frederick gave staff a tour of the facility. The business currently is involved in the decommissioning of semi-trucks and selling of used truck parts. They are considering the possibility of also producing glider kits at some point in the future. Glider truck kits are essentially a new truck cab and frame made by truck manufacturers that is sold to a facility that installs a rebuilt engine and transmission and truck axles from a used semi-truck. An article that further explains glider kits is attached to this activity report.

Staff met Mike who was in the process of tearing down the engine in a used truck. Fluids that are drained out of the trucks is collected and stored in one of several plastic totes by fluid type. Ms. Frederick indicated that the facility has a contract with Crystal Clean which is supposed to come the next day to characterize the waste fluids in the totes and provide them with disposal or recycling options.

The facility has gas fired space heaters for service heat which are exempt from air use permitting requirements under Rule 282 (b)(i). The facility does not have an emergency generator on-site. The facility has two cold cleaners (one owned by Crystal Clean) and staff provided Ms. Frederick with two operational stickers to place on these units. Provided employees follow the use requirements on the operational stickers, these units are exempt from air use permitting requirements per Rule 281(h).

Staff asked about the large paint booth on the east side of the building and Mike stated that they had recently repaired the air handling system for the booth and replaced all of the booth filters. We stepped into the booth momentarily to see the new booth filters. The facility would like to begin spray painting in the booth in the near future. Staff indicated that the spray booth is exempt from air use permitting requirements under Rule 287(c) provided the facility maintains monthly coating use records demonstrating that usage rate is not more than 200 gallons, as applied, per month and exhaust filters are properly installed and maintained. The facility has an older gun cleaner in storage and lacquer thinner will be used to clean the spray guns. The facility also has a small solvent still (< 55 gallon capacity) in storage and this equipment is exempt from air use permitting requirements per Rule 285(u).

Staff then asked about sandblasting equipment that was used by High Colors' prior operations in the facility. Staff sent High Colors a violation notice on August 23, 2013 for operating sand blasting equipment without particulate emission control equipment. High Colors' response dated September 13, 2013 indicated that sandblasting operations had been discontinued at the facility. Mike showed staff the room on the east end of the building where sandblasting used to be done and the room is now used for storage. Mike said that the sandblasting equipment was put into storage and wondered what would be required if they wanted to use it again in this room. Staff pointed out that the room's current exhaust ventilation fan on the south wall would allow uncontrolled dust emissions to the outside air. Staff stated that the facility would have to install an appropriately designed and operated fabric filter collector (e.g. baghouse) in order for this equipment to be exempt from air use permitting requirements per Rule 285(l)(vi)(C). Ms. Frederick asked staff to email this rule information to her following the inspection and this was completed upon staff's return to the office.

Staff left the facility at 12:45 pm. At the time of the inspection, all currently installed and operating process equipment is exempt from air use permitting requirements. -RIL

NAME RILDATE 11/29/16SUPERVISOR MB 11/30/2016