

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

N177225369

FACILITY: Rec Boat Holdings-Trailer		SRN / ID: N1772
LOCATION: 1552 Millner St., CADILLAC		DISTRICT: Cadillac
CITY: CADILLAC		COUNTY: WEXFORD
CONTACT: Rick Videan , VP Operations and Manufacturing		ACTIVITY DATE: 06/05/2014
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2014 FCE site inspection and records review.		
RESOLVED COMPLAINTS:		

Full Compliance Evaluation

I conducted an inspection and records review to determine the facility's compliance with Permit to Install (PTI) No. 19-06 and the Michigan Air Pollution Control Rules. At the plant I met with Mr. Jim Rosenberry, Plant Manager. Mr. Rick Videan, VP Operations & Manufacturing joined us later. I provided a copy of the environmental inspection brochure to Mr. Rosenberry.

The Trailer Plant produces trailers for the boats manufactured at other nearby Rec Boat Holdings plants. The process involves cutting, welding, and grinding steel, washing, painting, and assembly. The PTI addresses the the coating operations at the plant including the paint booths and ovens. This facility used to be subject to Title V, but VOC and HAP emissions have been limited to less than the major source thresholds by the synthetic minor permit.

EMISSION LIMITS - VOC emissions from painting operations are limited to 30 tons per 12 month rolling time period and VOC and acetone emissions combined from cleanup are limited to 12.0. Monthly calculations summarized in the MAERS emissions calculation attachment indicated that VOC emissions from primer and topcoat were 1.87 tons in 2013. Acetone solvent emissions from cleanup are less than one ton per 12 month rolling time period. There were no VOC clean up solvents used in 2013 These emissions are well below the limits specified in the PTI.

Individual hazardous air pollutant (HAP) emissions from the facility are limited to less than 9.0 tons per 12 month rolling time period and aggregate HAPs are limited to less than 25 tons per 12 month rolling time period. Based upon the manufacturer formulation data for the coatings, there are currently no HAP containing materials used at the facility and total HAP emissions from the facility are zero.

MATERIAL LIMITS - The primer and top coat coatings that are applied to the trailers are a mixture of either the topcoat or primer and additives that include reducer(solvent), slow dry, medium dry, and retarder. A VOC content limit of 2.8 pounds per gallon of coating as applied, minus water, is imposed through the PTI on the primer coating. A VOC content limit of 3.5 pounds per gallon of coating as applied, minus water, is imposed on the top coat. Company records (attached) indicate the primer content as applied is 1.77 lbs/gal and the topcoat is 2.61 lbs/gal.

PROCESS/OPERATIONAL LIMITS - All waste materials are required to be stored in closed containers. During the inspection, it was noted that there were no open containers throughout the facility.

EQUIPMENT PARAMETERS - There are two paint lines at the facility. According to Mr. Rosenberry, one of the lines has not operated in five years. The other paint line was in operation at the time of the inspection. The booth was equipped with two-stage filters. The primary filters are changed about every two days and the secondary "accordion" filters are changed around six weeks. The drying ovens are electrically heated. There were no visible emissions at the time of the inspection.

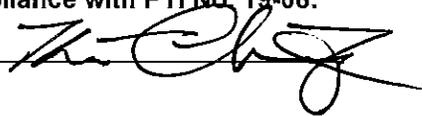
TESTING - There are no specific testing requirements for the facility at this time.

RECORDKEEPING/REPORTING/NOTIFICATION - All records and calculations are required to be completed by the 15th day of each calendar month for the preceding month. Records that I requested and reviewed were complete and up to date. Material usage records are maintained at the Trailer Plant (examples attached) Records of the chemical composition of the materials used at the facility are maintained by Dale Rasmussen at the Cruiser Plant(attached). Emission calculation records are

generated and maintained by Donna Koltunyak who works one day per week for Rec Boat Holdings. Material usage records are maintained on a weekly basis. Emission records are maintained on a monthly basis as required by the PTI. The records are comprised of manufacturer's formulation data, which is used to calculate VOC and HAP emissions from the facility. AQD staff found the records to be adequate upon inspection.

There are no specific reporting requirements other than the MAERS report. The MAERS report was submitted on time and has been reviewed.

CONCLUSION - Based upon the on-site inspection and review of records the facility appears to be in compliance with PTI No. 19-06.

NAME  DATE 6-19-14 SUPERVISOR 