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

N659325324

FACILITY: Monroe Truck Equipment		**SRN / ID:** N6593
LOCATION: 2400 Reo Dr, FLINT		**DISTRICT:** Lansing
CITY: FLINT		**COUNTY:** GENESEE
CONTACT: Andy Knake , Operations Manager		**ACTIVITY DATE:** 05/30/2014
STAFF: Brad Myott	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Perform scheduled inspection and determine compliance with PTI 368-98.		
RESOLVED COMPLAINTS:		

Facility Contact: Andy Knake: 810-845-9864, aknake@monroetruck.com

This inspection completes a full compliance evaluation.

Monroe Truck Equipment is located on the south side of Flint, along US-23 off of Hill Road. The area where it is located is a mixture of commercial and light industrial businesses.

Air emitting processes were installed at Monroe Truck Equipment in the late 1990's. Monroe Truck obtained Permit to Install (PTI) #368-98 for the installations. Monroe Truck sought to limit its Potential to Emit (PTE) by requesting enforceable restrictions in the permit that limited both Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) emissions below Major Source thresholds. At the time the Opt-Out Permit was issued, Monroe Truck Equipment was considered a "Synthetic Minor Source". They are also considered an Area Source. The following is a list of emission units at the facility.

Equipment	Description	PTI/Exemption	Status
EUBOOTH1	Large Surface Coating Booth	368-98	C
EUBOOTH2	Small Surface Coating Booth	368-98	C
EUBOOTH3	Bed Liner and Undercoat Paint Booth	Rule 287	C
EUDISTILL	Solvent Distillation Unit	Rule 285(U)	C

Because Monroe Truck is an Area Source, it appears that this facility is subject to the federal MACT NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, subpart HHHHHH. Because surface coating equipment at Monroe Truck was installed prior to September 17, 2007 the source is considered to be an existing affected source. For an existing affected source, the compliance date was January 10, 2011. For an existing affected source initial notification must have been submitted no later than January 11, 2010. There is no initial notification on record; however it is my understanding Michigan AQD does not have administrative authority for this regulation at this time.

Monroe Truck Equipment submits data to the Michigan Air Emissions Reporting System (MAERS) annually. VOC emissions reported for 2013 was less than 2 tons. Monroe Truck Equipment does not presently pay fees.

I arrived unannounced at 1:30 pm. Upon entry to the plant property I examined the exterior of the building. I did not notice any opacity from any discharge points at the facility, nor did I experience any odors. I met with Andy Knake, Operations Manager. Andy explained that they were not operating today as they do 4 (10) hour days and only the office is open on Friday but he agreed to show me around the facility. According to Andy business has been down a little but has started to pick up some recently.

Monroe Truck Equipment installs custom bodies to medium duty truck chassis and cab assemblies. Undercoating, primer, color coat, clear coat, and bed liner are part of their coating options. A permit, PTI #368-98, was issued for the installation of air emitting processes including two surface coating lines, an under coater, welding operations, and solvent clean-up.

Surface coating applications are being made to motor vehicles and mobile equipment at the facility. Andy and I discussed the operations at the facility. Business has been a little slow but appears to be picking up. Andy explained that the operations have not changed in the past few years since the previous AQD inspection. They are using the same number of booths and the same materials. No new equipment has been installed. Records

for 2014 identified 6 different HAPs emitted from the various surface coatings being used. Records also indicated that surface coatings used during the past 12 months did not contain any leaded or chromium compounds. No compounds of manganese, nickel, or cadmium were listed in any records submitted for surface coatings being applied.

Two Surface Coating Booths

Monroe Truck offers a powder coat option which is applied at another location. The addition of powder coating has reduced the need to use spray coatings from these two booths. Paint line production has declined to where paint booths are in use only about three or four hours a week. Records indicate that Booth #2 was used very rarely in the past year and not at all in February 2014.

Both surface coating booths are covered by PTI #368-98. Neither paint booth was in operation during my inspection. The booths are down draft type with mat type filters. According to Andy no significant changes had been made to the paint booths, exhaust, or spray equipment since the last AQD inspection in 2011. Andy stated that HVLP guns were still being used.

The booths are used to apply primer, color, and clear coatings to both metal and non-metal substrates. An asphalt based undercoating is not applied in the paint booths but in a separate room where durabed liner is also applied. Use records are being maintained for all coating applications as required by permit. The paint kitchen has a computerized weighing and mixing system that records all coating use on a per job basis. The paint is manufactured by PPG Paint out of Wisconsin. Data is downloaded by Foth Environmental out of Green Bay, Wisconsin. Emission calculations and coating use reports are created from the data by Foth. I was given a copy of the April 2014 report which had usage rates and emission calcs. through Feb. 2014. The following table identifies permit limits and the compliance data taken from the report.

February 2014 VOC Emissions Data from Coating Booths							
Emission Group	Pounds per Hour All *	Limit All	#1 Pounds per Month	#2 Pounds per Month	Limit Each	Tons per Year 12-month	Limit
Metal	2.0	12.3	21.9	0.0	2000	0.16	9.9
Non-Metal	0.0	12.3	0.0	0.0	na	0.0	2.4
Undercoating/bed	5.3	10.3			na	0.28	2.0
Clean-up		na			na	0.66	2.6

* This value is not a record keeping requirement of PTI #368-98, but it is calculated as part of the emissions summary. The total monthly average emission from both booths was approx. 2.0 pph for metal substrates. This is well under the limit of 12.3 pph of VOC.

Records indicated that the total coating use for February was 5.01 gallons paint, 0 gallons durabed liner, and 5.0 gallons of undercoat.

MIBK is the HAP emitted in the greatest quantity. In 12 months ending Feb 2014, 0.2 tons of MIBK were emitted. The limit for a single HAP is 5.0 tpy. Total HAP emissions for the same time period was less than 1 tpy. The limit is 15.0 tpy.

Solvent Distillation Unit

Solvent distillation is conditionally exempt from APC rule 201 by 285(u). The unit was physically too small to have a batch capacity greater than the 55 gallon maximum allowed for the exemption.

Records are being maintained for VOC emissions from purge and clean-up solvents as required by PTI #368-98. The recovered waste, purge, and solvents are reclaimed in the distillation unit and reused. Records indicate that 33 pounds of VOC was emitted in Feb from clean-up. The limits are 16.8 pounds per day, 2.6 tpy, and 55% recovery by weight.

Bed Liner and Undercoat Paint Booth (Room)

This booth is not described in the permit; however, it would be exempt by APC rule 287(c). Monthly paint use records indicate 5 gallons used for February. This is less than 200 gallons of coating per month.

Both bed liner and undercoat are applied in this room. The permit restricts VOC emissions from undercoat to 2.0 tons or less per year. The booth was not in use during my inspection. Clean overspray filters were in place.

The Durabed is a two component that is mixed at the gun nozzle. No purge, and very little clean-up is required for this product.

Metal Shop

A metal shop contains the equipment necessary to customize bodies or chassis as specified by the customer. The equipment that I identified would be exempted from the requirement to obtain an air use permit based on one of the following three exemptions.

- Brazing and welding is exempt by 285(i).
- Torch cutting is exempt by Rule 285(j).
- Rule 285(vi)(B) exempts machining, drilling, cutting, surface grinding, sawing, and turning of metal, wood, rubber, and plastic substrates.

After conducting the inspection and reviewing the records it appears that Monroe Truck Equipment is meeting the conditions of PTI 368-98.

NAME Brad Myott DATE 6/11/14 SUPERVISOR M. McClark