

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

U38180369844645

<b>FACILITY:</b> Wolverine Trailers, Inc		<b>SRN / ID:</b> P0927
<b>LOCATION:</b> 1500 Chanter Road, JACKSON		<b>DISTRICT:</b> Jackson
<b>CITY:</b> JACKSON		<b>COUNTY:</b> JACKSON
<b>CONTACT:</b> Kyle Johnson , Owner		<b>ACTIVITY DATE:</b> 06/07/2018
<b>STAFF:</b> Mike Kovalchick	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b>
<b>SUBJECT:</b> Small coating operation.		
<b>RESOLVED COMPLAINTS:</b>		

**Minor Source****Facility Contact**

Lyle Johnson-Owner

ph 517-782-4950

Gary Reisoner-Foreman

**Purpose**

On June 7, 2018, I conducted an unannounced compliance inspection of Wolverine Trailers, Inc. (Company) located in Jackson, Michigan. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules.

**Facility Location**

The facility is located just North of the town of Jackson in a rural wooded area. The facility is accessed via an unmarked gravel road located at 1500 Chanter Road. See attached aerial photo.

**Facility Background**

This Company makes trailer beds. It was incorporated on 8/03/2012 but may have been around since 2006. There is no record that it had been inspected before.

**Regulatory Applicability**

Only generally applicable rules such as Rule 301, 310 and Rule 901 apply to this facility. Permit to Install Rule 287 (2) (c) would apply if coating usage is less than 200 gallons per month, the exhaust system is supplied with a dry filter control system and usage records are maintained for the most recent 2-year period.

**Arrival & Facility Contact**

Visible emissions or odors were not observed upon my approach to the Company's facility. I arrived at approximately 9.00 am and proceeded to the facility. I was met by Gary Reisoner who is a foreman at the facility. I informed Gary of my intent to conduct a facility inspection and to review the various records as necessary. Gary indicated that he would call the owner and have him come by so I could speak with him. The owner is Lyle Johnson. After a few minutes, Lyle arrived.

**Pre-Inspection Meeting**

None. Gary answered basic questions about the Company as he walked me through the facility while waiting for Lyle to arrive.

**Onsite Inspection**

Gary told me that there are currently 13 employees working 5 days a week starting at 7 in the morning till 3:30 in the afternoon.

He showed me one of two warehouses located onsite. (There is a third building which appeared to be 3-side storage building.) We walked through the warehouse with some portable welding devices were being operated. In the far end of the warehouse (east end) there was an area designated to paint trailer beds. There was a large moveable curtain acting as a wall on the west side, open bay doors on the South side, and a side wall fan located on the east wall that made up the painting area. No painting was occurring during the inspection.

Gary explained that they use aerosol paint & primer cans to spray galvanized metal trailers. He estimated that they go through a pack of 24 cans once or twice a week. See attached photo of cans. In addition to the aerosol cans, they also apply paint using a paint gun. They first wipe the metal using xylene then spray it with paint. Xylene usage was estimated to be one 55-gallon drum every 3 months or so. See attached photo of xylene barrel. Paint usage was estimated to be one 55-gallon drum every 2 months. See attached photo of paint drum with paint content information. See Attachment (1) for MSDS of the paint. It is about 50% VOC's.

Next, Gary showed me the outside of the building, so I could see the side wall exhaust fan and bay doors. Both areas had evidence of paint overspray exiting the building.

About this time, the owner arrived. Lyle accompanied us on the rest of the inspection. We then walked over to the other warehouse. It appeared that they do some wood working in there with a minor amount of painting using aerosol cans. See attached photo.

Adjacent to this warehouse was a storage building. Next to the storage building, was a burn barrel. It was evident that burning of trash was occurring on a regular basis despite a nearby dumpster and regular trash service. I explained to Lyle that commercial buildings are not allowed to burn trash. No other findings.

### **Recordkeeping Review**

Based on the size of the operation, it was evident that the amount of coating being applied was well under the 200-gallon per month exemption so no records were requested/reviewed. Annual VOC emissions estimated at no more than 2 or 3 tons per year.

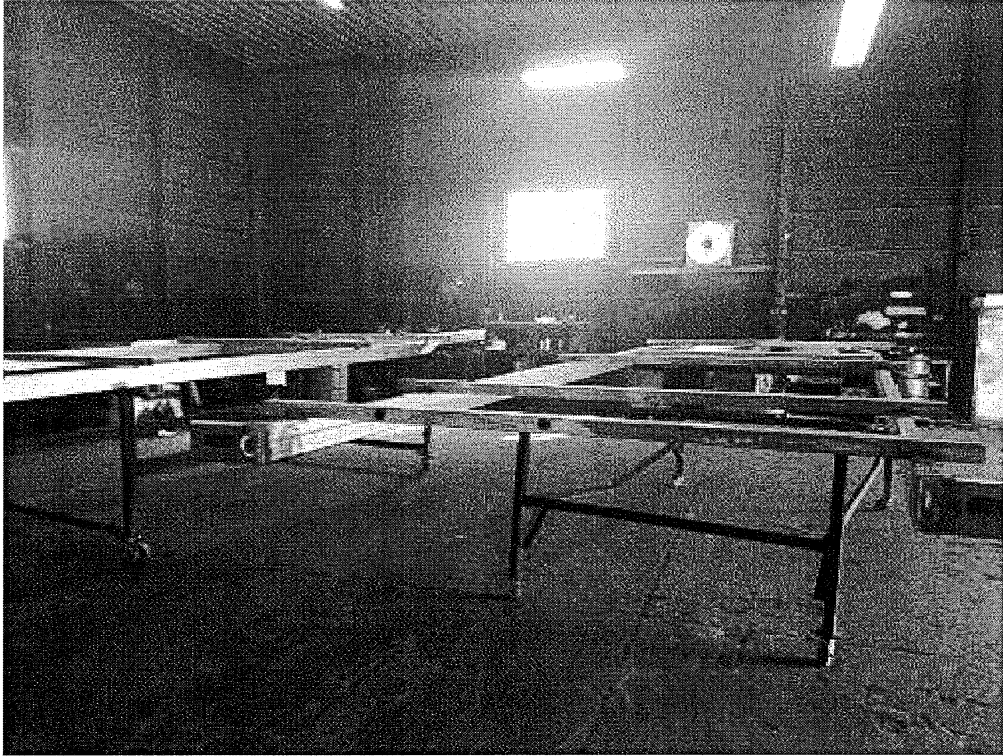
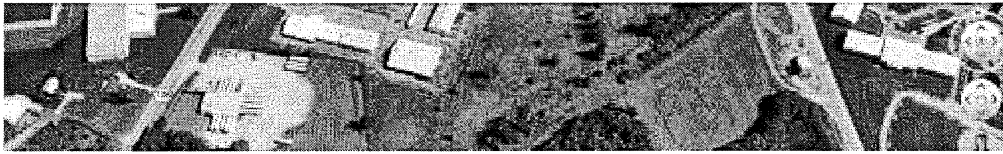
### **Post-Inspection Meeting**

I held a brief post-inspection meeting with Lyle. I explained to him that the coating operation would be considered exempt from PTI requirements if they install some type of fabric filter system for the side wall exhaust fan and keep the bay doors closed when painting. I also noted open burning was prohibited. I thanked Lyle for his time and cooperation, and I departed the facility at approximately 9:30 am.

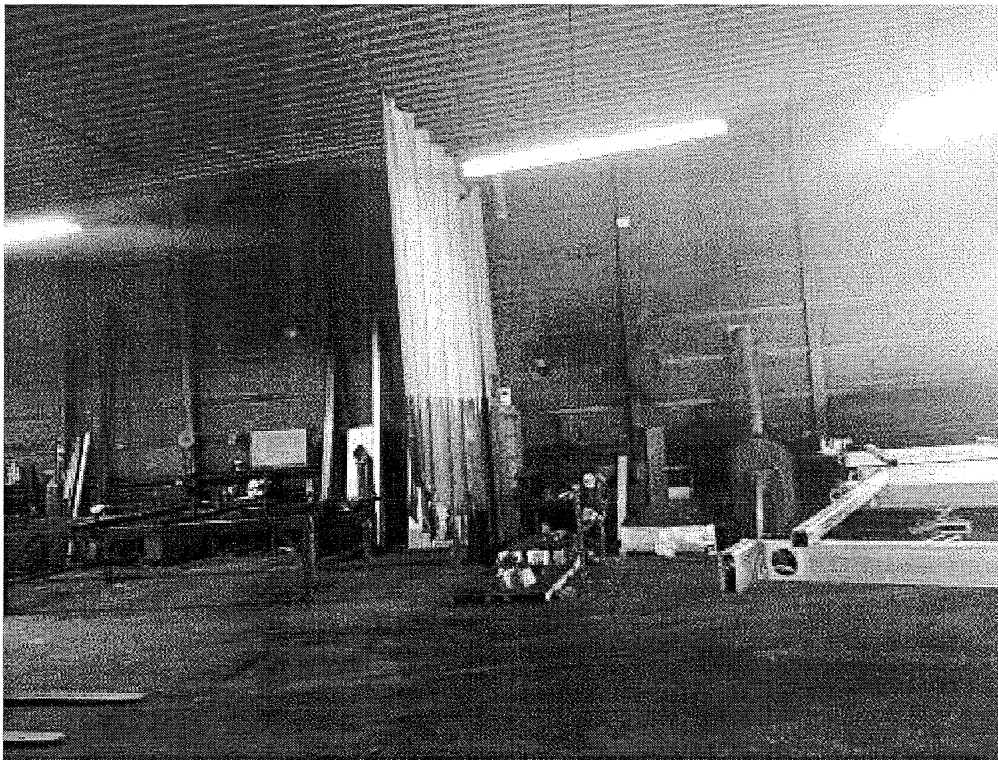
### **Compliance Summary**

The Company is out of compliance with Rule 201, no Permit to Install (PTI) for the coating operation due to lack of particulate control. The facility is out of compliance with Rule 310 which prohibits open burning of trash at commercial businesses. A Violation Notice (VN) will be sent to the Company and they will be given 21 days to respond.

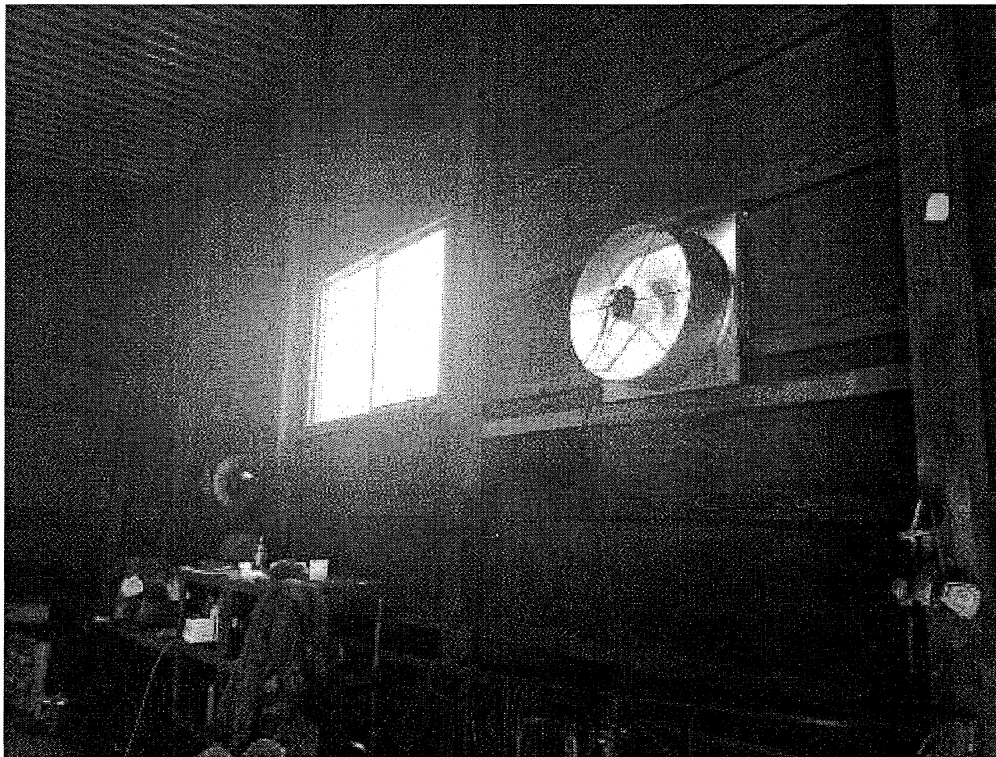




**Image 2(Coating area) :** Metal trailer bed coating room



**Image 3(Movable curtain)** : Movable curtain in coating area



**Image 4(Side wall exhaust)** : Side wall exhaust fan-interior view



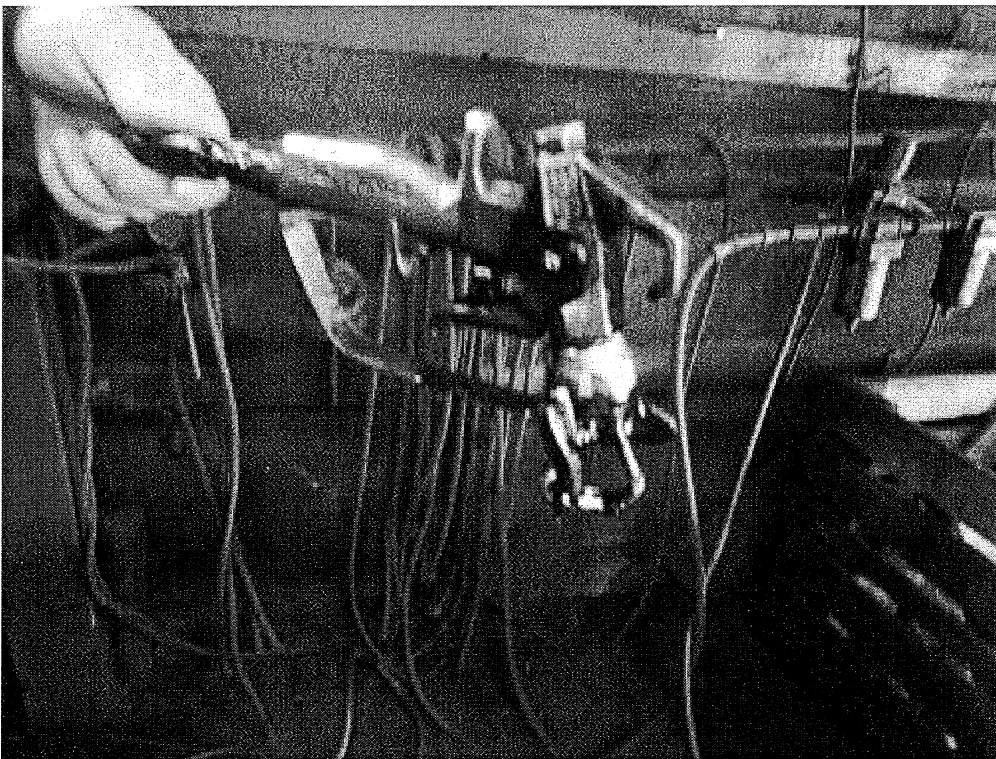
**Image 5(Exhaust fan)** : Side wall exhaust fan exterior view



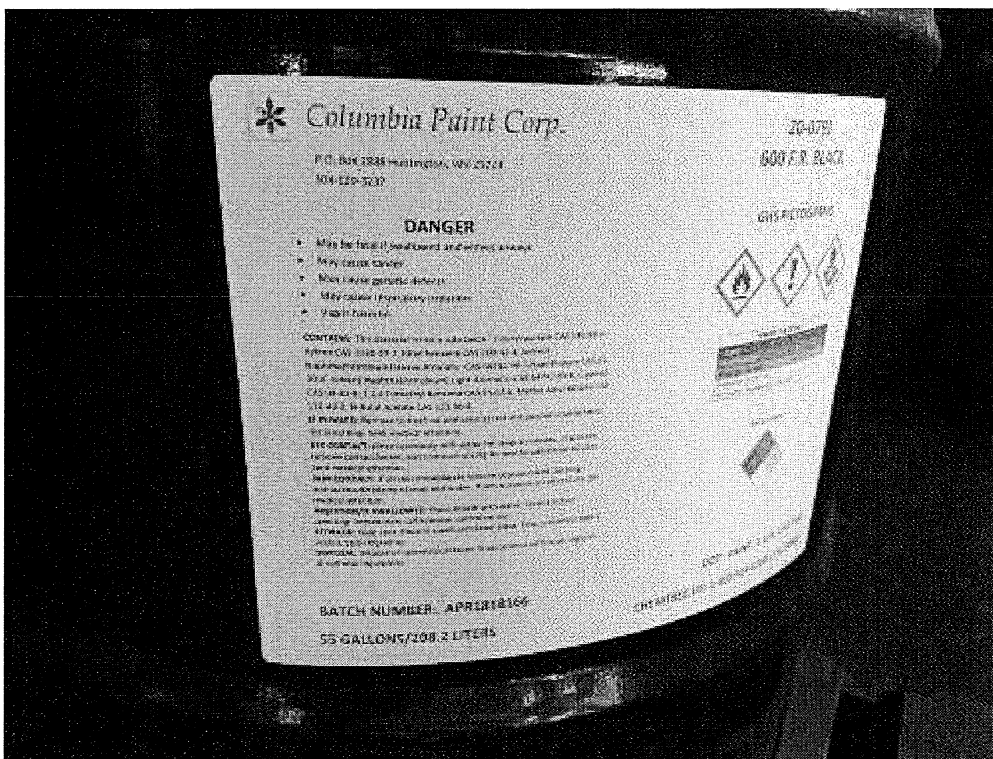
**Image 6(Bay doors)** : Bay doors to coating area with overspray on walls.



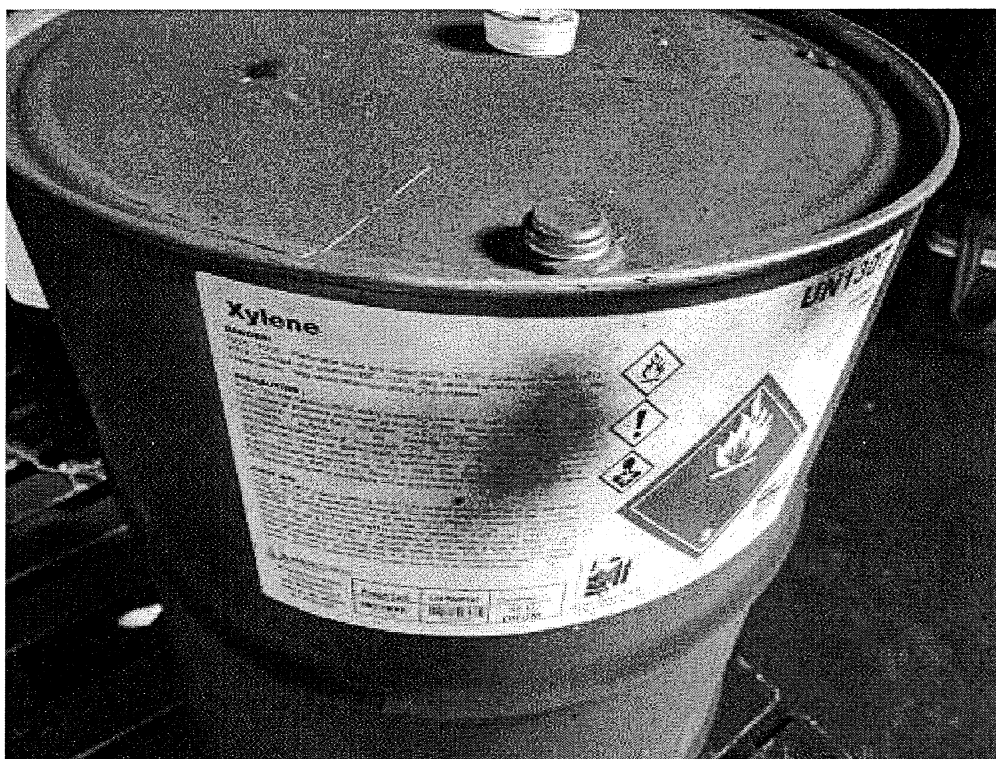
**Image 7(Paint cans)** : Paint can used to coat galvanized metal trailer beds



**Image 8(Paint gun)** : The one paint gun used to coat metal trailer bodies.



**Image 9(Paint Drum) :** Paint Drum with MSDS safety information on it.



**Image 10(Paint Solvent)** : Paint solvent used to wipe trailers beds prior to coating



**Image 11(Wood warehouse)** : Wood working warehouse with small coating operation.

NAME M. Kovalchek

DATE 6/8/2011

SUPERVISOR [Signature]