

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection**

N087967431

FACILITY: Morgan Olson, LLC		SRN / ID: N0879
LOCATION: 1861 CENTERVILLE ROAD, STURGIS		DISTRICT: Kalamazoo
CITY: STURGIS		COUNTY: SAINT JOSEPH
CONTACT: Brandon Stebing , EHS Manager		ACTIVITY DATE: 04/27/2023
STAFF: Chance Collins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: On-site inspection for FCE.		
RESOLVED COMPLAINTS:		

On April 27, 2023, AQD staff traveled to St. Joseph County to perform an inspection of Morgan Olson, LLC. The purpose of the inspection was to determine the facility's compliance with MI-ROP-N0879-2022 and applicable state and federal air pollution control regulations 40 CFR Part 63 Subparts A and Mmmm, 40 CFR Part 63 Subparts A and Pppp.

Morgan Olson, LLC (the facility) produces truck bodies that are used for delivery trucks. The truck bodies are primarily aluminum, but some are partially plastic. The production includes the building, undercoating, and finish coating of the bodies, as well as assembly of the finished motorized vehicle. The processes include spray coating, hand wiping, caulking, and sealant application.

AQD staff arrived on site at 09:15 a.m. to sunny conditions with a temperature of 57°F, and a south wind at 7 mph. There were no noticeable odors upon arrival.

AQD staff met with Brandon Stebing (EHS Manager) who answered all questions and escorted staff around the site. The following discusses the results of the on-site inspection and review of records:

EUP1UBOOTH: Plant 1 (Centreville Road) – manual spray coating booth for undercoat application.

Flexible Group ID: FG-MACT-MMMM

Pollutant	Limit	Actual	Compliance
	Tons per year (tpy)		
VOC and acetone	32 tpy	11.9 tpy	Appears to be

Exhausts filters are installed and maintained/operated in a satisfactory manner.

All records were reviewed on-site and are being maintained in a satisfactory manner.

Semiannual deviation reports and Annual compliance certification reports were received in a timely manner and were reviewed.

EUCEWIPE: Centreville hand wiping operations.

Flexible Group ID: FG-MACT-MMMM, FG-MACT-PPPP

Pollutant	Limit	Actual	Compliance
	Tons per year (tpy)		
VOC and acetone	32.8 tpy	10.5 tpy	Appears to be

All waste solvents were stored in an acceptable manner.

All records were reviewed on-site and are being maintained in a satisfactory manner.

Semiannual deviation reports and Annual compliance certification reports were received in a timely manner and were reviewed.

EUP5WIPE: Plant 5 hand wiping operations (Nottawa)

Flexible Group ID: FG-MACT-MMMM, FG-MACT-PPPP

Pollutant	Limit Tons per year (tpy)	Actual	Compliance
VOC	14.2 tpy	4.3 tpy	Appears to be

All waste solvents were stored in an acceptable manner.

All records were reviewed on-site and are being maintained in a satisfactory manner.

Semiannual deviation reports and Annual compliance certification reports were received in a timely manner and were reviewed.

FGCOATING: Grouping of surface coating operations in Plant 1 (Centreville).

Emission Units: EUPAINTBOOTHs, EUP1PARTS1, EUP1TUBBOOTH1, EUP1TUBBOOTH2, EUFINAL

Pollution Control Equipment: Dry filters

Pollutant	Limit	Actual	Compliance
VOC and acetone	103.8 tpy	28.1 tpy	Appears to be
VOC and acetone	66.0 tpy	11.4 tpy	Appears to be
VOC and acetone	77.5 tpy	15.2 tpy	Appears to be

General use coatings material limit is being tracked monthly. The highest calendar month was at 418 gal. This is under the limit of 425 gal/month.

All waste materials are being stored in closed containers.

All spent filters are being disposed of in a manner which minimizes the introduction of air contaminants to the outer air.

The drying oven portion of FGCoating was operating at 137°F.

An operation and maintenance plan (O & M plan) for the drying oven is implemented and maintained.

All records were reviewed on-site and are being maintained in a satisfactory manner.

Semiannual deviation reports and Annual compliance certification reports were received in a timely manner and were reviewed.

FG-MACT-MMMM: Equipment subject to the federal requirements for 40 CFR, Part 63, Subpart MMMM.

Emission Units: EUCEWIPE, EUPAINTBOOTHs, EUP5WIPE, EUP1PARTS1, EUFINAL, EUP1TUBOOTH1, EUPQUBOOTH, EUP1TUBOOTH2, EUCOLDCLEANERS, EUSEALANT, and EUMISC-VOC

Pollution Control Equipment: Dry filters

Semiannual reports certify that the facility appears to be in compliance.

FG-MACT-PPPP: Equipment subject to the federal requirements for 40 CFR Part 63 Subpart PPPP.

Emission Units: EUCEWIPE, EUPAINTBOOTHs, EUP5WIPE, EUP1PARTS1, EUFINAL, EUP1TUBOOTH1, EUP1TUBOOTH2, EUCOLDCLEANERS, EUSEALANT, and EUMISC-VOC

Pollution Control Equipment: Dry filters

Semiannual reports certify that the facility appears to be in compliance.

FGCOLDCLEANERS: Cold cleaners at the facility operating under the Rule 281(h) exemption. Most are used as spray gun cleaners.

Emission Unit: EUCOLDCLEANERS

All cold cleaners are maintained by Safety Clean.

FGRULE290: Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.

Emission Units installed prior to December 20, 2016: EUSEALANT, EUMISC-VOC.

Monthly emissions appear to be under 1,000 pounds per month.

NAME



DATE

5/18/23

SUPERVISOR

RIL 5/18/23