

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

N816567891

FACILITY: CHAMPION BUS INC		SRN / ID: N8165
LOCATION: 331 GRAHAM RD, IMLAY CITY		DISTRICT: Lansing
CITY: IMLAY CITY		COUNTY: LAPEER
CONTACT:		ACTIVITY DATE: 06/28/2023
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Attempted inspection of facility which closed in late 2021 or early 2022.		
RESOLVED COMPLAINTS:		

On June 28, 2023, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), attempted to inspect Champion Bus Inc. (Champion Bus), a facility which was last inspected in 2015. However, the plant was closed, and signage indicated that the property was for sale or lease

Facility description

Champion Bus, Inc. was a manufacturer of small- to mid-size and custom buses.

Facility contacts:

Unable to find an environmental contact at the website of the company, Forest River, which owns Champion Bus, only a recommendation to contact local dealers.

EGLE, AQD contact:

Dan McGeen, inspector; 517-648-7547; mceend@michigan.gov

Emission units:

Emission Unit*	Emission Unit Description	Permit to Install Exemption Rule	Compliance status
Paint booth #1	Downdraft coating booth with filters	Michigan Air Pollution Control (MAPC) Rule 287(2)(c); was 287(c) at time of installation	Not operating
Paint booth #2	Downdraft coating booth with filters	MAPC Rule 287(2)(c); was 287(c) at time of installation	Not operating
Paint booth #3	Downdraft coating booth with filters		Not operating

		MAPC Rule 287(2)(c); was 287(c) at time of installation	
Half booth	Small paint booth with mat/panel filter	MAPC Rule 287(c); was 287(c) at time of installation	Not operating
Welding processes	Mig welders, and one tig welder	MAPC Rule 285(2)(i); was 285(i) at time of installation	Not operating

***An *emission unit* is any part of a stationary source which emits or has the potential to emit an air contaminant.**

Regulatory overview:

This facility was considered by the AQD to be a true minor source of criteria air pollutants. *Criteria pollutants* are those for which a National Ambient Air Quality Standard (NAAQS) exists: carbon monoxide, nitrogen oxides, sulfur dioxide, lead, volatile organic compounds, particulate matter smaller than 10 microns in diameter, and particulate matter smaller than 2.5 microns in diameter. A facility is considered to be a *major source* for any one of those pollutants if the potential to emit (PTE) is equal to or greater than 100 tons per year (TPY).

The facility was considered to be a minor or *area source* for hazardous air pollutants (HAPs). A facility is considered major for HAPs if the PTE of a single HAP is greater than or equal to 10 TPY, or if the PTE of aggregate HAPs is greater than or equal to 25 TPY. A PTE demonstration has never been conducted for this facility, to the best of AQD's knowledge.

The paint booths at Champion Bus, Inc.'s Imlay City operated as exempt from needing a permit to install, under Rule 287(c). Rule 287(c) and 290 had been used by Michigan facilities for a number of years as legally enforceable restrictions to limit PTE. For some time, though, the U.S. Environmental Protection Agency (EPA) prohibited the use of these two rules as a means to limit PTE. However, just days before the 2015 inspection, AQD staff were informed that EPA agreed to once again allow these, as enforceable restrictions.

Fee status:

This facility was not considered fee-subject, because it was not a major source for criteria pollutants or for Hazardous Air Pollutants (HAPs), and because it was not subject to a federal New Source Performance Standard or a Maximum Achievable Control Technology standard. The facility was not required to submit an annual air emissions report via the Michigan Air Emissions Reporting System (MAERS).

Location:

The facility was located east of Imlay City, in a largely rural area, with a Hyponex composting facility to the immediate west, and scattered industries to the north and south. The nearest residences were located over 1,000 feet to the northeast.

Recent history:

The facility experienced a fire in 2010 and underwent a period of rebuilding afterwards. Before the fire, there had been two buildings, with two large paint booths. Following the rebuilding, they had a single large building containing two large booths, and they added a third paint booth. The AQD never received a complaint about this facility.

The most recent inspection by AQD, on 5/21/2015, did not identify any violations. At that time, AQD provided information on 40 CFR Part 63, Subpart HHHHHH, National Emissions Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, so that the company can determine if they were subject to this regulation. AQD did not have the delegation of authority to enforce this regulation. They were not subject to 40 CFR Part 60, Subpart MM, Standards of Performance for Automobile and Light Duty Trucks Surface Coating Operations, AQD was informed, during the 2015 inspection.

Pre-inspection preparation:

AQD inspector Dan McGeen had recently been informed by EGLE Water Resources Division staff that the Champion Bus Imlay City plant had closed in 2021 or 2022. He subsequently found a 10/21/2021 *Tri-City Times Online* article which indicated that the facility was expected to shut down in late 2021 or early 2022. The reason for the closure was said to be continual problems trying to get the bus chassis that they needed. The company which owned Champion Bus at that time, Forest River, was reported to be consolidating their remaining bus production at their plants in Elkhart and Goshen, Indiana.

Arrival:

On 6/28/2023, AQD was represented by D. McGeen. The attempted inspection was unannounced.

- Arrival: 11:02 AM
- Odors: None detected
- Visible emissions: None detected
- Weather conditions: Sunny and hazy (from wildfire smoke), and 71 degrees F, wind calm

Upon arrival, it was evident that the facility had closed, as a sign stated that the facility was for sale or lease. D. McGeen took the attached photo, showing the sign in front of the facility. He left the site at 11:04 AM.

Conclusion:

The facility was confirmed to be closed, and no instances of noncompliance were identified. There were no permits to install and no Renewable Operating Permit to be voided, for this facility.



Image 1(1) : For sale or lease sign at Champion Bus property.

NAME *David P. [Signature]*

DATE 7/10/2023

SUPERVISOR *RB*