



United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Camaco Columbus Manufacturing Company
1851 East 32nd Avenue
Columbus, Nebraska 68601
FRS# 110001512186

Mailing address:
Same as business

Inspection Date(s):
October 30, 2024

**Bowers,
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Avery Bowers, Inspector, ECAD, Air Branch

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CONTENTS

INSPECTION OVERVIEW	3
INSPECTION OBJECTIVE	3
FACILITY CONTACT INFORMATION	3
FACILITY OVERVIEW	3
FACILITY OPERATIONS SUMMARY	4
FIELD ACTIVITIES SUMMARY	5
Measurement and/or Sampling Activities	N/A
INSPECTION OBSERVATIONS AND POTENTIAL FINDINGS	6

TABLES

Table 1. APPLICABLE REGULATIONS AND STANDARDS	3
Table 2. INSEPCTION TEAM MEMBERS	3
Table 3. FACILITY CONTACT INFORMATION	3

FIGURES

Figure 1. Camaco webpage finished seat frame	5
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APPENDICES

- A – Camaco field photograph log (53 pages)
- B – Confidential Business Information (1 page)

**This Contents page shows all the sections contained in this report
and provides a clear indication of the end of this report.**

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the full compliance evaluation (FCE) inspection was to determine compliance of the facility with the Clean Air Act (CAA), specifically those requirements listed in **Table 1**. This report documents EPA's activities on site.

Table 1. APPLICABLE PERMIT CONDITIONS, REGULATIONS AND STANDARDS	
Code of Federal Regulations	Standard Name
40 CFR Part 63	Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities
Class II Permit: CP23-030	I. Standard Conditions II. General Conditions III. Specific Conditions

Table 2 lists the inspection team members.

Table 2. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
Avery Bowers	EPA Region 7, ECAD, Air Branch	Lead inspector
William Schriener	Air Compliance Inspector, Nebraska Department of Environment and Energy (NDEE)	Field team member

FACILITY CONTACT INFORMATION

Table 3 lists the primary facility contacts in order of contact during the inspection.

Table 3. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Anna Brock	Did not obtain on site	Did not obtain on site
Flor Felipe, Environmental Training Coordinator	Did not obtain on site	FFelipe@camacollc.com
Jason Buss, Human Resources Manager and Global Environmental Health and Safety leader	(402) -564-3211 Ext 350	jbuss@camacollc.com
Yasmin Basulto, Engineer Technician	Did not obtain on site	YBasulto@camacollc.com

FACILITY OVERVIEW

The facility was originally owned by Lomason and began doing business around 1965. Camaco Columbus Manufacturing (Camaco), LLC, acquired the property in 1999. The facility produces Ford Explorer, Ford F-150, and Chevy Malibu back seat frames for cars. It operates 24-hours a

day Monday through Friday and employes about 610 people. There are three shifts each day: 7:00 a.m. to 3:00 p.m., 3:00 p.m. to 11:00 p.m., and 11:00 p.m. to 7:00 a.m.

The last onsite compliance monitoring activities at the facility were on March 28, 2024, and May 14, 2024. The visits consisted of a PCE stack test conducted by the Nebraska Department of Environment and Energy (NDEE). NDEE completed a visible emission inspection on August 11, 2017..

According to EPA's Enforcement and Compliance History Online (ECHO) website, there has been no formal enforcement for air compliance at this facility for at least the past five years. NDEE has not issued any informal enforcement notifications to the facility.

According to Camaco's Class II air quality construction permit issued by NDEE on January 31, 2024, the facility is subject to the regulations and standards as noted in **Table 1**.

FACILITY OPERATIONS SUMMARY

Camaco manufactures backseat frames for vehicles through heaters, welding, drying ovens, presses, and painting operations. The facility has a Standard Industrial Classification (SIC) code 3714, categorized as Motor Vehicle Parts and Accessories, and a North American Industry Classification System (NAICS) code 33690, categorized as Other Motor Vehicle Parts Manufacturing. To begin the process, the raw steel arrives at the facility in coils. The steel goes through the tube milling process that forms the tubes. The tubes are cut to specific sizes depending on which line the operation is located. Facility personnel inspects the tubes before each tube continues through the welding process. Different components of the backseat frame are created through the stamping process. Giant presses are used to create the unique stamps. The components of the seat frame get washed and dried. Two different processes exist for painting the seat frame components. First is a powder coating and then heat coating. Once components are powder coated, they will go to the burn-off oven (emission unit-8). The paint that accumulates is burned off in an oven/incinerator for which a construction permit was issued January 31, 2024. Components are loaded into the oven and heated to approximately 800°F. An afterburner raises the temperature of exhaust gas to greater than 1,500°F to completely burn any remaining particulate and volatile compounds. At different points in time, there are different types of welding techniques used to laser the seat frame components together. In essence, Camaco uses a welding process that utilizes an electric arc to generate high temperatures, melting metal filler wire and the base material to create a weld. Camaco uses laser, Metal Inert Gas, Tungsten Inert Gas, and resistance welding to assemble the seat frame components together. Figure 1 depicts one version of a finished seat frame.



Figure 1. Camaco website finished seat frame image.

FIELD ACTIVITIES SUMMARY

On October 30, 2024, Mr. Schriener met me at a designated location at 7:47 a.m. We arrived at the facility at 8:19 a.m. The facility property did not allow drive-by surveillance, but we did not observe any visible emissions from the facility while we were on the property. We made entry at the front office at 8:23 a.m. I dialed the phone for the Environmental Health and Safety (EHS) manager. Ms. Brock came to speak to Mr. Schriener and me. She stated that the EHS manager was out but would find another person to greet us. Ms. Felipe introduced herself at 8:31 a.m. She stated she was covering for Julio Vasquez who is the permanent EHS manager. I introduced myself and Mr. Schriener, presented my credentials, and provided my business card to Ms. Felipe. The three of us headed into Ms. Felipe's office. Mr. Vasquez called Ms. Felipe, and she left the office. Jason Buss, the HR manager, came into the office at 8:43 a.m. with Ms. Felipe. I conducted an opening conference during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CAA, specifically, to determine compliance with the regulations and standards listed in **Table 1** and gave Mr. Buss my business card. I explained that after asking for some general business information, I would observe work practices, process units, emission units, control equipment, and also, review associated records demonstrating compliance with the air construction permits. We went to Mr. Buss' office at

8:54 a.m., and I asked some general questions. I explained to Mr. Buss that the facility would have an opportunity to make a claim of business confidentiality at the end of the inspection.

Mr. Schriener and I were given a facility tour by Mr. Buss and Ms. Felipe at 9:13 a.m. We were asked to wear safety boots, high visibility jackets, safety glasses, and earplugs because of facility wide policy. On the tour, Mr. Schriener took photos of the processes, operations, and equipment (Appendix A) at the site. While Mr. Schriener took the photos, Mr. Buss explained the facility processes at each point of the tour. I noticed a Robo-vent system whose light was not green, and Mr. Buss explained that the Robo-vent was not running. I did not ask for further explanation as to why it was not operating. We concluded the tour at 10:13 a.m. After the tour, I conducted a records review. I asked to review the log for the natural gas usage in the heat ovens, Safety Data Sheets (SDS) for the E-Coat paint and the powder coat paint, manufacturer manual for Jackson Oven, written certification of training on operation of Oven (PI Signoff) logs, digital and papers of burn off oven operations, and the gas/diesel usage amounts at the facility. Mr. Buss provided me all the information via email on October 30, 2024. I also asked about whether the facility still had the emergency generator (emission point 15S) at site. Mr. Buss replied that all generators on site are rentals and not owned by Camaco. At 10:53 a.m., Yasmin Basulto, engineer technician, entered the conference room.

I conducted the closing conference with Mr. Schriener, Mr. Buss, and Ms. Basulto present. I did not provide the facility with copies of Small Business Information Sheet. I did not leave the facility with a Notice of Potential Findings. Mr. Buss did not claim anything as confidential during the site visit (**Appendix B**). Mr. Schriener and I departed the facility at 11:05 a.m.

Observations and potential findings from the facility tour, records review, and sampling/measurement activities are noted in the **Investigation Observation and Potential Findings** section below.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions, and field activities were documented in the field records. All photographs are attached as **Appendix A**. I made the following observations during the inspection. I discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

Prior to going on the inspection, I reviewed the facility's past permits and inspection reports from NDEE. Since Camaco's acquisition of the facility, there have been several changes to the conditions the facility must follow and the subparts to which it is applicable. According to the inspection reports from 2001 to 2015, the facility started as a Title V major source due to the Volatile Organic Compounds (VOC's) and Hazardous Air Pollutants (HAPs) potential to emit amounts being over the major source threshold but was reclassified to a minor source in 2004.

In 2001, the facility was only painting a third of its parts and was discussing methods to be reclassified as a minor source. The facility was subject to New Source Performance Standards (NSPS) Part 60 Subparts CCCC/DDDD, *Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006*, and Subpart EEEE, *Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006*. An inspection was conducted on September 17, 2002, to determine the facility's reclassification status. The inspection concluded that the facility would still be a major source due to the amount of glycol ether present in the paint used. The inspection conducted in 2003 concluded that the facility emitted 21.37 tons of single HAP (glycol ether) and would retain its major source classification and would continue to be subject to the NSPS requirements. The facility was also using a paint that contained 2.6 pounds of HAP per gallon which was noncompliant with the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart MMMM standards.

According to the inspection report NDEE submitted on May 23, 2007, the facility received a new permit that re-classified it as a minor source on May 5, 2004. The facility agreed to limit the VOCs and HAPs in its solvent to under the major source thresholds by switching to a low HAP solvent. One of the chemicals in their previous solvent, butyl cellusolve, was removed from the HAP list on May 5, 2005. The facility returned to using the solvent containing butyl cellusolve in 2006. The next inspection report submitted on September 12, 2011, stated the facility was applicable to NESHAP Subpart CCCCCC, *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities* and Subpart XXXXXX, *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*. The facility was still classified as a minor source, and its class II operating permit was re-issued on April 12, 2011.

On June 15, 2012, Camaco submitted a permit revision. The permit revision established the facility's lack of applicability to Subpart XXXXXX per determination made by Mr. Terriquez of EPA Region 7 in a letter addressed to NDEE on November 23, 2011. NDEE conducted an FCE on June 23, 2015. The report stated the facility was subject to Subpart CCCCCC and received

approval for a new powder coating operation on April 30, 2024. The last on-site inspection conducted by NDEE was on August 11, 2017. NDEE went to see if there were any visible emissions, and they observed none.

Camaco installed a new electro-coating line in January 2019. The new operation would not increase the facility's emissions to the class II operating permit thresholds. On December 27, 2023, the facility submitted a construction permit for its new heat clean oven. The permit was approved on January 31, 2024, and the facility installed the heat clean oven, emission unit (EU) 8 shortly after. NDEE determined that EU-8 was not subject to NSPS Subpart CCCC/DDDD or EEEE.

I reviewed the particulate matter (PM) emission test results for the heat clean oven that was conducted on March 28, 2024. The sampling procedures included EPA Methods 1-5 and Method 202. The allowable limit is 0.10 grains per dry standard cubic feet per minute (gr/dscf). The test results showed the facility was passing with an average rate of 0.007 gr/dscf.

Permit condition III (B)(1) states the facility must only use natural gas or propane to operate EU-8. During the inspection, I asked Mr. Buss what the facility uses, and he sent me the natural gas usage log for the heat clean oven on October 30, 2024.

Permit condition III (B)(2)(a) states the facility must conduct a performance test for the EU-8 to ensure it meets the PM limit. The performance test was conducted on March 28, 2024. I reviewed the test prior to the inspection, and EU-8 passed the performance testing.

Permit condition III (B)(3)(a) states that the materials incinerated in the burn-off oven should be limited to coatings on metal parts. I asked Mr. Buss for the materials burned off and the SDS for paints used. The materials burned off are powercron black feed (e-coat), and black texture hybrid (powder coat). While the concentration of ingredients in the e-coat are not hazardous to health or the environment, the chemicals in the powder coat are hazardous. On October 30, 2024, he provided an excel sheet titled "Burn off Log" to show what materials went into the unit. The data contained some materials that are identified by letters and numbers. I asked Mr. Buss for a legend to be able to identify the materials in the oven on December 5, 2024. To the date of this report, I have not received a legend/key to identify the materials that go into the heat clean oven.

Permit condition III (B)(3)(b) states the facility must properly install, operate, and maintain the heat clean oven per manufacturer's specifications or its equivalent. While on-site, I asked Mr. Buss for the manufacturer's manual. He stated he would send me an email with the PDF documents. On October 30, 2024, Ms. Basulto emailed me the manufacturer's manual. The oven is a Jackson Oven. Permit condition III (B)(3)(b) also states that each operator has read the

instructions for proper operation of the drying ovens. Ms. Basulto also sent me the “Sign Off” sheet of all the employees who have certified that they know the instructions for operating the oven.

Permit condition III (B)(3)(c) states the heat clean oven should not be ignited until the afterburner temperature is above 1,500 °F. IMG_0373.JPG shows the temperature of the afterburner set to a minimum of 1,500 °F.

Permit condition III (B)(3)(c)(i) states the afterburner should be equipped with a thermocouple to measure the temperature of the secondary chamber and record it. IMG_0373.JPG shows the secondary chamber temperature on the left reading at 679 °F.

Permit condition III (B)(3)(d) states the temperature of the heat clean oven afterburner should be maintained at or above 1,500 °F. IMG_0375.JPG shows the temperature wheel for the heat clean oven during a charge. The temperature is being maintained at or above the permit threshold.

Permit condition III (B)(5)(a) states the facility must record the date, time, and duration of the burn off charge. Permit condition III (B)(5)(b) states the facility must record the type of material combusted during each charge. Permit condition III (B)(5)(c) states the facility must record the temperature of the secondary chamber at the moment the primary chamber is ignited for a burn-off charge, halfway through the charge, and at the end of a charge. On October 30, 2024, Mr. Buss submitted an excel sheet with the Burn-off Log to comply with these requirements.

40 CFR 63.11111(b) requires Camaco to comply with 63.11116 because the facility has monthly throughput of less than 10,000 gallons of gasoline. Section 63.11116(a) states the facility must handle gasoline in a manner that will not result in vapor releases to the atmosphere for extended periods of time. I asked Mr. Buss to explain how the facility minimizes the chances of gasoline spills and how the spills are cleaned up. He stated that the facility has a Spill Prevention, Control, and Countermeasure Plan (SPCC). Mr. Buss emailed me the plan on October 30, 2024. Mr. Buss also emailed me the values for the gallons of gasoline purchased. In 2023 and 2024 the monthly values of gasoline purchased was between 185 and 469 gallons. The facility does not dispense more than it purchases.

While reviewing the documents the facility submitted on October 30,2024, I emailed Mr. Buss on December 5, 2024, to ask what materials the heat clean oven recovers, and he stated it recovered the metal hooks to be re-used in the paint process. The facility does not appear to be subject to NSPS Subpart CCCC or DDDD because the oven meets the definition of a burn-off oven. The definition of burn-off oven in both Subparts states, “means any rack reclamation

unit, part reclamation unit,” and therefore, not considered as an incinerator. Since the facility is reclaiming the hooks for re-use by using EU-8, the unit is not subject to either subpart.

I also reviewed the facility’s submitted documentation to determine its applicability to NSPS Subpart EEEE. Under Subpart EEEE, the facility’s heat clean oven is defined as a material recovery unit. The subpart states that for material recovery units, “[the facility’s] unit is excluded if it combusts waste for the primary purpose of recovering metals.” It appears that the facility does not have any NSPS or NESHAP regulatory requirements.

End of report.