



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Clean Air Act Full Compliance Evaluation Inspection Report

McClarín Plastics, LLC
Yakama Nation Reservation
Wapato, WA

Inspection Date: August 8, 2023

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Table of Contents

1. Basic Facility and Inspection Information.....	3
2. Facility Description	4
3. Compliance History.....	5
4. Records Review.....	5
5. Inspection Elements/Order	9
a. Pre-Inspection Observations	9
b. Entry and Opening Conference	10
6. Facility Walk-Through.....	10
7. Closing Conference	12
8. Geospatial Measurement of Air Pollution (GMAP)	13

Attachments

Attachment 1	EPA Region 10 Digital Image Log
Attachment 2	EPA Records Request

1. Basic Facility and Inspection Information

Facility: McClarin Plastics, LLC
Yakama Nation Reservation
180 East Jones Road, Wapato, WA 98951

Mailing Address: 180 East Jones Road
Wapato, WA 98951

AFS/FRS Number: 110020518028

NAICS: 326199, All Other Plastics Product Manufacturing

Permit Number: R10T5030201

Facility Contacts: Alan Sanchez
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Yakama Nation Rep: Terry Ganuelas
Air Quality Technician
Yakama Nation Environmental Management Program

Date of Inspection: August 8, 2023

Inspection Start/End Times: 9:45 – 13:58

Inspection Notice: This was an unannounced inspection.

This was a Clean Air Act (CAA) compliance inspection by the Environmental Protection Agency (EPA). Inspector Conley, EPA Region 10, led the inspection. Elizabeth Sanchez, the Program Manager for the Yakama Nation Environmental Management Program, was made aware of the inspection beforehand and Terry Ganuelas, Air Quality Technician, of Yakama Nation participated in the inspection. The purpose was to identify potential compliance concerns with CAA regulations, specifically to gather information in order to determine if facility is subject to and in compliance with national emissions standards for hazardous air pollutants (NESHAP) WWWW for reinforced plastic composites production, NESHAP PPPP for plastic parts and products surface coating facilities, and NESHAP MMMM for miscellaneous metal parts and products surface coating facilities and determine compliance with the Title V Air Operating Permit issued by EPA Region 10.

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection and from a subsequent records review. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

2. Facility Description

The following facility description is based on information provided by a facility representative in the opening conference as well as the permitting and compliance record.

McClarin produces custom components from fiberglass-reinforced plastic (FRP or "fiberglass") for military, industrial, and commercial products, including recreational vehicle and motor home parts, spas, military vehicle hard tops, bus parts, lavatory bath modules, food storage components for mobile food service vehicles, and industrial lift parts.

The FRP process involves fabrication of composite products from liquid resins structurally reinforced with glass fibers. The most common resin used in FRP production is polystyrene. Polystyrene is a thermoset resin, which is applied as a liquid, hardens when heated, and remains a solid when cooled to room temperature. Other types of resins harden through exposure to ultraviolet light, through the addition of a hardener or catalyst, or by the combination two components that react upon contact.

Fiberglass matting is shipped into the facility and cut onsite. The resin is stored in a tank located at the building exterior. Pipes run inside to a tank located in the closed moulding area. Pumps in the facility move resin to the spray guns via pipes. Some heating is required to maintain the resin temperature above 65F. In the wintertime the building heaters supply the heat to maintain temperature in the pipes as well as to cure the resin.

Reinforced Plastic components at this facility are formed using several processes including:

1. Open moulding, where resins are spray applied to a substrate (a mold or form) that is open to ambient air;
2. Closed moulding, where resins are poured into matched dies or injected into closed forms that are not open to ambient air until the resin has set;
3. Vacuum forming, where sheets of plastic are heated until pliable and placed over a mold in which an open valve draws a partial vacuum.

Resins can be applied by hand (e.g., with a brush or roller) and spray applied with HVLP guns. Frequently, a gel coat is applied to the surface to improve a final product's appearance and resilience. Gel coats can have a variety of colors and finishes added to them. In moulding, gel coat is spray applied to the empty form before the resin is applied.

After the moulding or forming process is complete the product is popped out of the form and the piece is sent to other areas of the facility for grinding, followed by sanding and detailing. There are four grinding booths at the facility. Most parts are buffed or coated after moulding and grinding.

3. Compliance History

There has been one full compliance evaluation for the Clean Air Act in the last five years, in September 2019, and two partial compliance evaluations conducted offsite in 2021 and August 2022. The EPA Enforcement and Compliance History Online (ECHO) database also lists a RCRA compliance evaluation on November 29, 2022.

ECHO lists no quarters with non-compliance in the last three years as of 9/23/2023.

4. Records Review

Semiannual and Annual Compliance Reports

Permit Conditions 3.47 and 4.49 require the facility to submit Semiannual and Annual Compliance Reports to EPA. I reviewed reports submitted by the facility from January 2021 through the date of the inspection.

Records Request

EPA requested records at the on-site inspection. The list of the requested records is Attachment 2 to this report. I presented the facility with the records request in the opening conference and reviewed the records in a conference room following the facility tour. Below is a summary of the records received from the facility, with my response for each record.

Table 1: Records Review

Permit Condition	Requirement	Records
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3.13	General Conditions	Fugitive dust surveys for the last 3 years.
3.14	General Conditions	Fugitive Dust Plan from the last 3 years.
3.33	General Conditions	Open Burning Records over the last 5 years.
Response: Records were provided on-site for the fugitive dust surveys and the fugitive dust plan. The facility reported at the inspection and in their compliance certifications that they have not conducted any outdoor burning. The facility provided quarterly fugitive dust surveys for the last three years and their fugitive dust plan. The records did not indicate they observed fugitive dust.		
3.47	General Conditions	Semi-Annual monitoring reports for the period covering 2018-2022.
3.49	General Conditions	Annual Compliance Certification for the period covering 2018-2022.
Response: The facility provided these records on-site. I had these records available for off-site review as well. They were all submitted to EPA in the 5 year period requested and on file in Region 10. The certifications were complete and generally indicated compliance with the permit terms and conditions.		
4.3	Facility Wide: Fuel Sulfur Limits	Documentation showing the fuel meets the definition of natural gas in 40 CFR 72.2
4.9	Facility Wide: Quarterly Visible Emissions Survey	Records from the last 4 surveys.
Response: The fuel sulfur limit documentation was provided as the purchase records for natural gas. I reviewed all four visible emission surveys, all reported no emissions. Alan Sanchez conducts the surveys and said he observes emissions from all facility vents.		
4.14 - 4.16	Facility Wide: Records to show rolling 12-month VOC emissions are under 249 tons.	Provide one year of: 4.16.1. Material purchase records; 4.16.2. Monthly gelcoat usage; 4.16.3. Monthly resin usage in open molding operations; 4.16.4. Monthly quantity of resin or gelcoat mixed; 4.16.5. Number of batches mixed each month; 4.16.6. Monthly VOC-containing solvent usage to clean equipment used in open molding and

		mixing operations; 4.16.7. Quantity of VOC-containing material stored in open or partially-open containers each month; 4.16.8. Monthly resin usage in repair operations; 4.16.9. Monthly resin usage in closed mold operations; 4.16.10. Monthly usage of polyurethane adhesives; 4.16.11. Monthly usage of reactive adhesives; 4.16.12. Monthly usage of polystyrene foam; 4.16.13. Monthly usage of each VOC-containing coating or solvent used in the spray booth; 4.16.14. Monthly usage of each VOC-containing material used in support activities; 4.16.15. Monthly natural gas usage; 4.16.16. Safety Data Sheets (SDS); 4.16.17. Emission factors used; 4.16.18. Vapor pressure of materials stored in the tanks; 4.16.19. Parameters used to determine emission factors; and 4.16.20. Any other information used to determine monthly facility emissions of VOC.
Response: <i>The facility provided these records on-site. I discussed with them in detail how they track coating usage to comply with these conditions. The facility responded that coatings are tracked by work order. I requested a copy of the MSDS for Sika Flex 252 Black 101995 and Raptor Bedliner catalyst 110519 as well as 104113 Primer Low VO3 2.1 Dupont 1380.</i>		
Desk review: The facility provided a copy of the coating usage records for Booth 8 which indicates the container used, asks for the size of the container's opening, the resin/gelcoat part number, how much was mixed in pounds, the temperature of the liquid, and how long it was mixing. The area of the opening is recorded on the booth log as "LRTM." I asked Alan about this and he said that field will be changing now that they have a new consultant and that they will also be keeping the LRTM container closed. The information on each line is the		

same for each day, Alan said this is a standard process and the quantity used is based on the size of the container.		
5.23	WWWW	For the last 2 years: 5.23.2 A copy of each notification and report submitted by the permittee to comply with the requirements of Section 5 of this permit, including all documentation supporting any initial notification or notification of compliance; 5.23.2. All data, assumptions and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Condition 5.8 or Table 7 to 40 CFR part63, subpart WWWW; 5.23.3.A certified statement that the permittee is in compliance with the work practice requirements of Condition 5.11.
Response: <i>The facility provided all of the reports requested, I also had brought copies of the reports submitted to EPA to the inspection. I asked the facility about the data, assumptions, and calculations used to determine HAP emissions. Alan told me that they supply a consultant with the usage for each product, MSDS, material formulations, and other information requested by the consultant and the consultant performs the calculations for the semi-annual reports. The majority of the data supplied to the consultant is stored and maintained in a central database used by McClarin and is based on usage and purchase records.</i>		
5.26	WWWW	Records of maintenance performed on monitoring equipment for the period 2018-present.
Response: <i>There is not any monitoring equipment.</i>		
5.28	WWWW	Semi-annual compliance report for 2019-2023.

6.13	PPPP Monitoring and Recordkeeping Requirements	Log of surface coating of plastic parts. 6.3 compliance, for 2022 – present.
6.14, 6.16-6.18	PPPP Monitoring and Recordkeeping Requirements	For the years 2019 – 2023: Each notification and report submitted to comply with the requirements of Section 6 of the permit, and the documentation supporting each notification and report.
6.19	PPPP	Semi-annual compliance reports from 2021-2023
7.1	MMMM	Monthly records of rolling 12-month HAP coating usage between June 2022- June 2023
Response: Alan provided the reports and logs, the rolling 12 month usage is included in responsive reports.		
9.2	Booth	Manufacturer’s stated control efficiency for the first and second layer of the booth filters, specification sheet etc.
Response: These records were provided, and I was able to take a copy with me. The booth filter efficiency was consistent with the requirements of the Title V permit.		
9.6	Booth	Records of the pressure differential across the exhaust filters.
Response: The facility provided the booth records but the records do not include a reading of the pressure. The facility explained that they replace the filters daily and don’t record the pressure for that reason.		
40 CFR 63.5835(d)	WWWW Standards	Provide a copy of your start-up, Shutdown and malfunction plan.
Response: This facility does not have a control device subject to this requirement.		

5. Inspection Elements/Order

a. Pre-Inspection Observations

When I arrived in the parking lot of the facility there was a distinct styrene odor. I didn't examine the building exterior for open doors or other obvious sources of odor beyond the rooftop vents visible from the parking lot.

b. Entry and Opening Conference

I entered the main building at 9:45am, accompanied by Terry Ganuelas. I introduced myself at the front desk and asked to speak with the environmental manager. I met with Alan Sanchez and Ed Smith in a conference room and presented my inspector credential and explained that I was conducting an unannounced Clean Air Act (CAA) compliance evaluation. I handed Alan the list of records that I wanted to review onsite, included in Attachment 2.

The opening conference started immediately after our introductions. I explained that I would be taking photos onsite, taking notes, and potentially interviewing staff. We discussed the number of full-time employees, 160, and the hours of operation, Monday – Friday, two 12-hour shifts and one shift on Saturday. The plant manager is Miguel Mendoza. Alan described the production process in the opening conference and I have included his description in Section 2.

I asked about how the facility complies with the requires in their Title V permit.

- NESHAP Subparts M MMM, P PPP, and W WWW – According to Alan Sanchez, the facility tracks the coating and materials indicated in their semi-annual reports. Alan said that purchase and usage records are kept in one database and SDS sheets are stored in another database. For each project there is a specific recipe, McClarin orders and tracks the specific coating and material purchases and usage related to individual projects. The beginning inventory and the final inventory for each material is tracked and used to determine the total material usage. This material usage information and the SDS sheets for each product are used by Trinity consultants to create the semi-annual compliance reports.
- Quarterly fugitive dust monitoring – Alan described the quarterly fugitive dust monitoring activity as an observation of dust (or lack of dust) at each exhaust stack for 5 minutes.
- Complaints – Alan Sanchez stated that the facility had not received any complaints but that they would conduct a root cause analysis and look into which order was active in the facility if there were any complaints received.

The opening conference concluded at 10:09AM.

6. Facility Walk-Through

The inspection team was escorted by Alan Sanchez and Ed Smith during the facility walkthrough.

The inspection included a thorough walkthrough of the facility and taking photographs/videos.

The walkthrough began at 10:10AM. A digital photo log is Attachment 1 to this report.

Detail Area

On the way to the open moulding section in the back of the facility I stopped to take a photo of the Detail Area. In the Detail Area, employees sand or grind sections of parts or entire parts that are too small or intricate for the grinding area. There are five filters along one side of the Detail Area with tarps over the other openings in the wall. Facility staff in this area were wearing particulate masks. Photo P8080091 shows the filters and the covered wall vents.

Open Moulding

The open moulding area is in the rear of the facility. The mat cutting, gel coating, chopping, gun cleaning, and curing all take place in the open moulding area. The mat material is cut and placed in a mold which has been coated with a gel coat prior to installing the mat, employees spray the fiber mat with a chopper gun which sprays a fiber resin catalyst onto the mat. Employees use handheld rollers to massage air bubbles out of the fiber mat and distribute the resin and catalyst.

On the walk through the manager for the open moulding operation, Guillermo Hernandez, met us to answer questions about the process. While in the open moulding area I observed an employee cleaning a chopper gun by spraying acetone through the gun and into the room. The acetone supply was kept in a closed container as seen in photo P8080094 (red container) but the acetone spray was not collected into a container.

Ovens

Depending on the customer, some parts are cured in ovens before they are popped out of the mold. The ovens vent into the facility and not through a stack. If parts are not cured in the ovens, they are cured at room temperature.

Grinding

After we left the open moulding area, I was led to the grinding area. This area is restricted and requires a full-face respirator with a PM 2.5 cartridge. Photo P8080099 shows the grinding area. Particulate matter from the grinding is controlled with cylindrical micro air filters. The floor near the grinding area has some material tracked onto it and I was warned it can be slippery.

Coatings

Alan Sanchez noted that the facility had not conducted paint work since the end of July. If coatings are required to be applied after the parts are cured and detailed the coating takes place in spray booths at the facility. When coating or painting takes place at the facility booth records are submitted at the end of each month.

I observed spray coating using aerosol cans in the Plastic wheel well detail area. I asked Alan about the plastic coating and he said pieces may be coated using gun spraying and with aerosol cans.

Closed Moulding

We met with Erik Rodriguez, the manager of the closed moulding area. In the closed moulding area, there is a spray booth where gel coating is applied to the mould before the mat and resin are injected to the mold. I noticed that the odors in this area of the facility were as strong as odors in the open moulding area. Gel coating was applied to the moulds in a booth located in the same closed moulding area, Photo P8080098. After the gel coat is applied the closed mould is filled with the fiber, resin and catalyst and left to cure. The LRTM resin mixing and storage is located in this area of the facility. Photo P8080097 shows the tan LRTM resin tank called the Day Tank, which was open at the time of the inspection and the orange LRTM Sheer Tank.

Building Exterior

We walked outside of the building to look at the storage tanks. Only one tank is currently in service, the Heavy Truck (HT) Tank which holds a resin, Photo P8080100. The tall tank adjacent to the HT tank is out of service but contains GP resin, Photo P8080101. The LRTM tank located outside the closed mold area is open with a stick in it, it looks the same as the photograph collected as part of the 2022 inspection. All three tanks had a visible brown material running down their sides, from the tank tops to the ground.

7. Closing Conference

At approximately 12:00, Terry and I returned to the facility conference room to review records, discuss the inspection and conduct the closing conference. I led the closing conference and summarized the parts of the facility we had visited during the inspection and our observations related to CAA. I went through my inspection notes and described potential compliance concerns from the inspection. The following were identified as potential compliance concerns during the closing conference:

1. Spraying acetone wash into facility air rather than collecting in a closed container.
2. Booth filter differential pressure records don't indicate that a pressure reading was taken because the filters are changed on a daily basis.
3. The LRTM day tank is not closed.
4. Outdoor tanks have signs of spills and one tank has been left open.

I explained that the inspection would not be complete until I have reviewed all the records that the facility submitted, reviewed my notes, and written an inspection report. Terry Ganuelas and I departed the facility at 13:18.

8. Geospatial Measurement of Air Pollution (GMAP)

The EPA National Enforcement Investigation Center conducted air monitoring on the McClarin property on August 9th, 2023. Details of that inspection will be provided in a separate GMAP report.