



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

Air Branch

Air Branch Inspection Report
Unannounced Partial Compliance Evaluation
Trinity Marine Products (a.k.a. Arcosa) – Plant 73
2077 County Line Road #337
Caruthersville, MO 63830
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Inspection Date(s):
March 14, 2023
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Date: 2023.06.29
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Charlotte Papp, Inspector, ECAD, Air Branch

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- A Confidential Business Information (4 pages)
- B Request for Documents (1 page)
- C Field Photographs (13 pages)

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and provides a clear indication of the end of this report.**

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the partial compliance evaluation (PCE) inspection was to determine compliance of the facility with the Clean Air Act (CAA), specifically those requirements located in the code of federal regulations at 40 CFR Part 63 Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production. The inspection was part of the U.S. Environmental Protection Agency's (EPA) Creating Cleaner Air for Communities National Enforcement Compliance Initiative.

Table 1 lists the inspection team members.

Table 1. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
Charlotte Papp	EPA, Region 7, ECAD, Air Branch	Lead Inspector
Todd Raney	MDNR Southeast Regional Office	Inspector

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Ricky Flippo, Safety Coordinator (closing conference only)	573-333-1840	Ernest.flippo@arcosa.com
Brian Woodburn, ES&H Manager (closing conference only)	573-333-6151	Brian.woodburn@arcosa.com
Shannon Wallace, EHS Manager	-	Shannon.wallace@arcosa.com
Brandon Shaw, Plant Manager	-	-
Preston Hall, Maintenance Supervisor	-	-

FACILITY OVERVIEW

According to the Arcosa Marine Products - Plant 73 Title V operating permit (permit number OP2016-019), issued by the Missouri Department of Natural Resources (MDNR), the facility is subject to the following regulations and standards subject to review during this inspection (**Table 3**):

Table 3. APPLICABLE REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR Part 63	Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production

According to the permit the facility is required to have 5 years of applicable records relating to the above standard.

According to the Enforcement and Compliance History Online (ECHO) database, Plant 73 has had 0 quarters with violations in the past 3 years. The most recent compliance evaluation was completed on January 17, 2023, and was conducted by MDNR. The facility uses the Standard Industrial Classification (SIC) code 3089 (Plastics Products), and the North American Industrial Classification System (NAICS) code 326121 (Unlaminated Plastics Profile Shape Manufacturing).

FACILITY OPERATIONS SUMMARY

Arcosa Marine Products Plant 73 manufactures fiberglass covers and access doors for barges via an open molding process. The mold is first sprayed with a gelcoat and allowed to cure. Next a layer of “chop” is applied, followed by a woven roll and then a resin coat. The mold is finalized by trimming excess materials and affixing any hardware. The emissions are vented up to the trimming process via a general ventilation system. The trimming area has filters and a dust collection system that is periodically cleaned out and debris is disposed of alongside other facility waste.

Gelcoats are stored in a chemical storage area in drums, while resins are stored in a silo room. Quantities of gelcoat and resin used are recorded via a material usage form associated with each cover produced at the facility. According to Mr. Wallace, the facility typically measures the weight of the container storing the material before and after application to the mold to determine the quantity of product used. The facility is a major source of volatile organic compounds, primarily styrene, a hazardous air pollutant (HAP).

FIELD ACTIVITIES SUMMARY

I arrived at the facility on March 14, 2023, at approximately 10:57 am. I made entry at the front entrance and introduced myself and members of the inspection team, presented my credentials, and provided my business card to Mr. Wallace. I was given a facility safety briefing by Mr. Wallace. 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 conditions listed in Table 3. I explained that after asking for

some general business information, I would observe work practices, process units, emission units, control equipment and review associated records demonstrating compliance with the permit. I explained to Mr. Wallace that the facility could make a claim of business confidentiality and provided him with a Confidential Business Information form (**Appendix A**). Mr. Wallace did not make a claim of confidentiality at that time. I was given a facility tour by Mr. Wallace, Mr. Shaw and Mr. Hall. I was asked to wear the following PPE for general site safety: safety glasses, steel toed boots, ear plugs.

The site tour began at approximately 11:05 am with the warehouse. I observed the two main production lines of the facility. According to Mr. Shaw, the facility produces approximately 6 covers, including doors and attachments per day.

I observed gel coat being applied to a mold. According to the facility each cover will use approximately 150 pounds of gel coat. They measure the amount of product used by weighing the storage containers before and after application to the mold.

We continued along the process line to the trimming area. According to Mr. Wallace, staff use pneumatic saws and grinders to trim excess materials and finalize the covers. The ventilation system in this area consists of side vents with filters that are periodically cleaned out.

After the trimming area I saw the chemical storage room, as well as the resin storage room. We continued outside the facility to the location where staff conduct Method 22 monitoring.

After the site tour, we broke for lunch. We reconvened at Plant 75 (265 County Highway 346 Caruthersville, MO 63830) to briefly discuss recordkeeping and conduct the closing conference. I requested copies of the records as indicated in **Appendix B**.

I conducted a closing conference with the attendees listed in Table 4 below. I provided the facility with copies of the small business resource information sheet. I discussed potential compliance concerns and outlined the next steps in the inspection process. The concerns that I mentioned were as follows: there was a lot of dust and debris in the trimming area, and the resin storage room had debris and spills on the walls and cannisters. We established a deadline of March 31, 2023 to transmit the records I had requested (**Appendix B**). The records were transmitted on March 30, 2023 via Kiteworks (facility provided access to EPA), and are currently under review.

I departed the facility at 2:44 pm.

Table 4. Closing Conference Attendees		
Name, Title	Phone No.	Email Address
Ricky Flippo, Safety Coordinator	573-333-1840	Ernest.flippo@arcosa.com
Brian Woodburn, EHS Manager Plant 75	573-333-6151	Brian.woodburn@arcosa.com
Shannon Wallace, EHS Manager Plant 73	-	Shannon.wallace@arcosa.com
Ted Carter, Marine Div. Safety Director	-	-
Jeri Shull, Corporate Env. Director	-	-

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions and activities were documented in field records. All photographs are attached as **Appendix C**. 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.

There was a significant amount of dust and debris on the floor and near the vent inlet in the trimming area (photos 31-32).

The resin storage room had a significant amount of spills and debris on the sides of containers and walls of the room (photos 36-38).

The location where the Method 22 test is conducted appeared to be an adequate location to perform Method 22 monitoring according to the regulatory method.

The facility's compliance calculations for Subpart WWWW appear to be complete and demonstrate compliance based on my preliminary review of the information submitted on March 30, 2023.

End of Report.