



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: See Date of Section Supervisor Signature Below

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Molding Products, LLC, South Bend, Indiana

FROM: Natalie Schulz, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Molding Products, LLC

Facility Location: 1545 S Olive Street, South Bend, Indiana

Date of Inspection: November 8, 2021

EPA Inspectors:

1. Natalie Schulz, Environmental Engineer
2. Dakota Prentice, Environmental Engineer
3. David Sutlin, Environmental Engineer

Other Attendees:

1. Ling Tapp, Air Compliance Inspector, Indiana Department of Environmental Management
2. Troy Wade, President, Molding Products, LLC
3. Lori Green, Safety, Health, and Environmental Manager, Molding Products, LLC
4. Tracy Baysinger, Corporate HSE Manager, IP Corporation

Contact Email Address: lgreen@molding-products.com

Purpose of Inspection: Evaluate compliance with NESHAP WWW: Reinforced Plastic Composites Productions

Facility Type: Reinforced plastics composite production facility

Regulations Central to Inspection: NESHAP WWW and Title V permit

Arrival Time: 1:00 p.m.

Departure Time: 3:00 p.m.

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet: See document included with delivery of this report.
- ☐ Small Business Resource Information Sheet not provided.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from the Molding Products staff unless otherwise noted.

Process Description:

The film and fiberglass used in production are purchased; the paste is made onsite. Styrenated resins and styrene are brought to the facility by truck. Calcium carbonate is brought to the facility by train.

The paste manufacturing process is divided between large-scale mixers and small vats; 90% of paste is produced in the mixers and 10% in the smaller vats. The paste produced in the smaller vats is added at the end of the process to modify the color and thickness of the final paste. This mixture is then sent to a holding tank.

The sheet molding compound (SMC) machines compress a layer of chopped fiberglass particles between two layers of paste and film so that a layer of paste and film is on each side of the fiberglass. The edges are sealed. The product sits in the maturation room for approximately 24 hours before being sent to customers.

Staff Interview:

- Molding Products started operations in 1978.
- 50 to 60 employees work at the facility.
- NESHAP WWW, Table 4 - Acetone is used for plant-wide cleaning.
- NESHAP WWW, Table 4 - The film used at the SMC machines has a 1 mm nylon base.

- The facility increased production capacity several years ago by adding a larger mixer, five blend tanks, two styrene tanks, and five resin tanks. The facility is planning an expansion of the facility in the next few years but has not yet submitted any permit applications. This expansion may significantly increase emissions from the facility.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

- NESHAP WWW, Table 4 requires covers on all containers with HAP material except during the addition or removal of materials. Inspectors walked through the production area and observed covers on all containers filled with HAP-containing materials; NESHAP WWW includes resins, gel coats, catalysts, monomers, and cleaners as examples of HAP-containing materials.
- The NESHAP requires that all vats have entirely closed lids. Some of the vats' covers have half-circles cut out; the facility cut the half-circles in the covers to allow for the stacking of the vats.
- The NESHAP does not require any PM emission control devices. The permit prohibits dust crossing the property line and limits opacity to 20%. Fiberglass particles are seen on the ground outside near a dust collector, which is voluntarily operated by the facility. There was no visible opacity in the area, and dust was not seen crossing the property line.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Annual compliance certification for 3 years
- Deviation reports for 3 years
- Current air permit
- Renewal permit application
- Filter maintenance schedule

Concerns: Inspectors stated that they saw fiberglass particles on the ground outside near the dust collector.

DIGITAL SIGNATURES

Report Author: **NATALIE
SCHULZ**  Digitally signed by NATALIE SCHULZ
Date: 2022.01.03 16:34:04 -06'00'

Section Supervisor: **Brian
Dickens**  Digitally signed by Brian
Dickens
Date: 2022.01.04
12:20:01 -06'00'