



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Partial Compliance Evaluation

Malarkey Roofing Products Portland, Oregon

Inspection Date: September 2, 2021

Report Author Signature

Date

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Date

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Date

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1. Basic Facility and Inspection Information

Facility: Malarkey Roofing Products
3131 N. Columbia Blvd
Portland, OR 97217

Mailing Address: Same

FRS Number: 110070329174

Facility Contacts: Shane Uecker – Plant Manager
503-240-7869, seucker@malarkeyroofing.com

Mike Tuel – EHS Manager
503-283-1191, mtuel@malarkeyroofing.com

Agency Inspectors: Zach Hedgpeth, PE – EPA Region 10
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Agency Staff: Brad Venner – EPA NEIC
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Inspection: September 2, 2021
Inspection Report: November 3, 2021

Inspection Notice: Unannounced

Disclaimer

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

2. Introduction

- a) The primary purpose of this inspection was to collect onsite pollutant measurements of the outside air using the Geospatial Mapping of Air Pollutants (GMAP) vehicle-mounted instruments.
- b) A secondary purpose of this inspection was to conduct a brief site tour to examine the coaters and visually assess capture of the emissions from the coaters.

3. Inspection Elements and Field Observations – September 2, 2021

- a) We arrived at the facility around 08:54 and entered the facility office. We introduced ourselves at the front desk and learned that the environmental manager, Mike Tuel, was working remotely. I spoke briefly with Mr. Tuel by phone, and he informed me that he would ask Shane Uecker, the Plant Manager, to meet us. Mr. Uecker met us at the office around 09:40.
- b) Opening Conference – The opening conference was held in the facility office with Mr. Uecker. I explained the purposes of the inspection as described above. I presented my inspector credentials to Mr. Uecker at this time. Photography was discussed, and Mr. Uecker explained that the equipment immediately downstream from the coater would be considered confidential by the company¹.
- c) GMAP Mapping – Following the opening discussion, Mr. Uecker and I walked to the GMAP vehicle in the facility parking lot, where Mr. Venner gave a brief tour and explanation of the pollutant and geospatial measurement capabilities. Mr. Tuel arrived at about 10:09. We began mapping using the GMAP vehicle shortly following Mr. Tuel's arrival and completed outdoor data mapping around 10:42. The data collected by the GMAP vehicle is included as Attachment 2 to this report, and consists of a .csv file containing the raw data as well as several .kml mapping files which can be opened using Google Earth to show the measurement results visually.
- d) Plant Tour – A brief plant tour was conducted, focused on observation of the two coaters. The facility refers to the two coaters as the South Line Coater (composite roofing shingle production line) and the North Line Coater (water/ice protection product line). Photos, visible light videos, and infrared videos were recorded as detailed in Attachment 1 – Photo and Video Log. FLIR² videos were recorded between 11:10-11:30. Both coaters were observed while in operation.
 - 1. South Line Coater: I noted that the front of the coater was enclosed with hard plexiglass sheets. Observation indicated that visible emissions from inside the coater plexiglass enclosure were captured by the hood placed over the top of the unit, but that emissions were released to the building air from the coater outlet,

¹ Photos and videos containing information claimed as confidential business information (CBI) are listed in Attachment 1 – Photo and Video Log, but have been withheld from this report.

² FLIR GF320 infrared gas imaging camera. The specific camera used during this inspection was S/N 44401715. Use of the camera during this inspection followed U.S. EPA Region 10 Office of Environmental Assessment Standard Operating Procedure OEAFIELDSOP-111 entitled “Optical Gas Imaging with a FLIR GF320 Infrared Camera”, which is included as Attachment 3.

and from the hot coated fiberglass sheet as it moved downstream from the coater to where aggregate is applied.

2. North Line Coater: This coater was not enclosed with plexiglass, and has a plastic sheet hanging in front of the machinery. According to Mr. Uecker, this coater operates slower and cooler than the South Line Coater. A smaller amount of visible emissions were observed relative to the South Line Coater.

4. Closing Conference

- a) An informal closing discussion occurred in the facility offices at approximately 11:30 with Mr. Uecker and Mr. Tuel.
- b) I provided a brief overview of the EPA Region 10 compliance and enforcement process and discussed the timeline for issuance of the inspection report.
- c) Emissions from the coater outlet area were identified as a potential compliance concern. Mr. Uecker explained that in addition to building the plexiglass enclosure, the facility has increased the vacuum flow rate from the South Line Coater to improve emissions capture. The facility also plans to similarly enclose the North Line Coater in the future.

We departed the facility following the informal closing discussion.