

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

A586967805

FACILITY: WEST MICHIGAN OFFICE INTERIORS		SRN / ID: A5869
LOCATION: 300 E. 40TH STREET, HOLLAND		DISTRICT: Kalamazoo
CITY: HOLLAND		COUNTY: ALLEGAN
CONTACT: George Williams , General Manager		ACTIVITY DATE: 05/12/2023
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On May 12, 2023 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 300 East 40th Street, Holland Michigan at 2:00 PM to conduct an unannounced air quality inspection of West Michigan Office Interiors (hereafter WMOI) SRN (A5869). Staff made initial contact with the office receptionist and stated the purpose of the visit. George Williams, WMOI, General Manager, is the environmental contact and arrived shortly thereafter and took staff assist staff with conducting the inspection.

WMOI is a facility that refurbishes old office furniture to like new condition. This includes recoating of metal parts, reupholstering, and repairing or replacing wood or panels. WMOI was last inspected by the AQD on August 13, 2012, and appeared to be in Compliance at that time with the Environmental Protection Act 1994 PA 451 (Act 451). Staff asked, and Mr. Williams stated that the facility does not have any emergency generators, boilers, or cold cleaners.

Mr. Williams gave staff a tour of the facility. Required personal protective equipment are safety glasses, steel toe boots, and hearing protection. Staff observations and review of records provided during and following the inspection are summarized below:

Metal Sanding Area:

This area of the plant is located in its own room in which contains two downdraft tables used for power sanding metal parts. The debris is caught in the downdraft tables and routed to cartridge filters and captured in a container on the floor below. There is no outdoor exhaust for this unit. The equipment appears to be exempt from needing a permit per Rule 285(2)(I)(vi)(B).

Metal Coating Booth & Oven:

This processing area is a conveyerized line that is used to coat and bake metal and plastic parts. The line routes through a spray booth, where an operator applies a liquid spray paint to the parts. The spray booth is equipped with fabric filters. Staff was told that the filters get changed once a month. During the inspection the filters looked adequate for use with not too much caking and no large rips or tears that would appear to effect performance.

The coating portion of this line previously operated under Rule 287(c). Staff indicated to Mr. Williams that with this exemption there is a 200 gallon per month usage limit for coating used on the coating line. Staff also indicated that the facility would need to provide monthly usage records to demonstrate compliance with the exemption.

The facility provided paint purchase records for the time period of January 2021 through April 2023. The records showed that the facility only purchased more than 200 gallons of paint during

that time period. This occurred in June of 2022 and the facility purchased 230 gallons of paint. The facility also recorded that the WMOI did not buy any gallons of paint in the following month July 2022. Besides the June 2022 month the highest monthly amount of paint purchase was 110 gallons which occurred in May 2021. The average monthly amount of paint purchased appears to be between 60-80 gallons per month. Besides the one exceedance based on purchase records the facility appears to operate using less than 200 gallons of paint per month through the paint booth.

Although the facility did exceed the 200-gallon limit using purchase records for the month of June 2022. Staff thinks it is plausible that actual usage records was below 200 gallons since the facility did not purchase any paint in July 2022. Staff did mention to Mr. Williams however that if the facility wishes to continue using purchase records to show compliance then the purchase amount should not exceed the 200-gallon limit. Staff stated if WMOI wants to be able to purchase more than 200- gallons of paint per month then they would have to use find a way to track actual usage. Overall Staff thinks WMOI is able to show compliance with Rule 287(2)(c).

After the coating both the parts then moved through a natural gas curing oven. Staff was provided with a document that identified the burner of the oven having a maximum heat input value of 0.85 MMBTU/hr. Staff asked Mr. Williams if the facility cleaned the hooks used for the coating line themselves or if they were sent off site to be cleaned. The facility stated that the hooks were sent off site to be cleaned. This appears to be exempt from permitting per Rule 282 (2)(b)(i).

Aerosol Paint Booth:

The facility has a small touch up paint booth that only uses aerosol spray cans. The facility is not required to record the number of spray cans used in the booth but did provide purchase records for the aerosol cans used for the time period of January 2021 through April 2023. The facility appears to purchase at most 24 cans every 3-4 months to be used in the in booth. The facility recorded using 60, 24, and 12 for the years 2021, 2022, and 2023 respectively. This paint booth appears to meet the requirements of Rule 287(b).

Glue Booths:

The facility has two spray booths located in the center of the building that are used for applying an adhesive to fabric or foam chairs, tackboards, and flipper doors. These booths are filtered and discharged upwards into the general in-plant environment.

During the previous inspection it was noted that the paint booths were operating under Rule 287 (a), which allowed for up to 2 gallons per day per line before they obtained a permit. During the inspection it was noted that the only usage records were purchase records.

Per the Part 1 rules a surface coating is defined as any paint, lacquer, varnish, ink, adhesive, or other coating material applied on a surface. From this definition Staff believes the facility would be able to utilize exemption Rule 287(2)(c).

Staff was provided purchase records for the period of January 2020 through June 2023. The facility only purchases a single 55-gallon drum about every 6 months. The facility appears to meet the requirements of the 200-gallon per month limit to show compliance.

The adhesive BSA- 6429 F that is used is composed of methylene chloride (dichloromethane) which is a Hazardous Air Pollutant (HAP). The usage is low currently at the plant but if the facility were to increase operations that utilizes this adhesive could cause problems with HAP Potential to Emit.

Board Room:

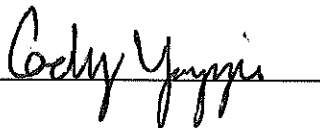
This is a station utilizes various cutting, sanding, and rounding boards. The exhaust from each is vacuumed into a common duct and sent to a cyclone pre-cleaner. The exhaust from the cyclone then goes to a bag filter assembly, and into the general in-plant environment. This operation appears to be exempt from permitting per Rule 285(2)(I)(vi)(B).

Misc. Solvents:

The facility occasionally uses methyl ethyl ketone (MEK) as clean up wipes. The facility previously was utilizing Rule 290. The methyl ethyl ketone has an ITSL of 5000 ug/m³ and 24-hour averaging time. This categorization would allow for up to 2000 lbs of methyl ethyl ketone to be used a month. Purchase records from the company that the largest amount of this that was bought in a single month was 4 gallons in September of 2019. MEK has a density of 0.805 g/cm³ or 6.72 lb/gallon from the SDS sheet provided by the facility. This calculates 4 gallons to be 26.84 lbs of MEK use in the largest month. The facility appears to be in compliance with Rule 290.

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in compliance with Act 451 state rules and regulations. Staff stated to Mr. Williams that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 3:00 PM.-CJY

NAME



DATE

7/13/23

SUPERVISOR

