

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

B618144195

FACILITY: ART VAN FURNITURE		SRN / ID: B6181
LOCATION: 6500 East 14 Mile Road, WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Mike Case , Director of Loss Prevention		ACTIVITY DATE: 03/26/2018
STAFF: Kerry Kelly	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

On March 26, 2018, I Kerry Kelly, MDEQ-AQD, conducted an unannounced inspection at Art Van Furniture located at 6500 14 Mile Road, Warren, Michigan. The purpose of the inspection was to determine the facility's compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451 and Permit to Install (PTI) No. 375-77.

I arrived at the facility at approximately 3:15 PM, entered the Customer Service Office and identified myself to the receptionist. The receptionist introduced me to Mr. John McInnis, Director-Service and Quality Control. I introduced myself to Mr. McInnis, showed him my photo credentials and explained the purpose of my visit. Mr. McInnis explained that the person who typically handles environmental compliance, Mr. Mike Case, was not available but he could have the Repair Center Manager, Mr. Bill Brozik, show me the facility.

**PTI 375-77**

PTI 375-77 was issued to Art Van Furniture on November 8, 1978 for one Binks spray paint booth.

**FACILITY OVERVIEW**

Operations at the Art Van facility on 14 Mile Road in Warren include selling, warehousing, and repairing furniture. Furniture repair takes place in the warehouse building which is attached to the furniture showroom. Customer service and information technology activities take place in an adjacent building (call center).

**INSPECTION**

At the warehouse building I met Mr. Brozik, identified myself, and explained the purpose of my visit. I asked Mr. Brozik if there were any boilers, emergency generators, or parts washers at the facility. Mr. Brozik stated he was unaware of any boilers or parts washers at the Art Van facility. I did not see any boilers or parts washers during the facility walk-through. According to Mr. Brozik, there are emergency generators for the call center building and the showroom.

Mr. Mike Case, Art Van, provided engine specifications for each generator at the facility (Attachment 1). According to the documentation, the generator on the call center roof is a natural gas/propane-fired Onan Modified Ford V-8 with a kW rating of 80 (approximately 780,000 Btu/hour, assuming 35% thermal efficiency). The generator servicing the showroom is a Cummins Model GTA28 with a maximum heat input of 7.2 MMBtu/hour. Based on my observations during the inspection, the information provided appears to be accurate. According to Mr. Case, both generators were installed in February 1999. These generators appear to be exempt from the requirement in R 366.1201 to obtain a permit to install per R 336.1282(2)(b)(i). It appears these generators are not subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63 Subpart ZZZZ) per 40 CFR 63.6585(f)(2), because they are commercial generators located at an area source of HAPs. However, MDEQ has not accepted delegation to enforce 40 CFR 63 Subpart ZZZZ at area sources of HAPs. The generators also do not appear to be subject to the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines (40 CFR 60 Subpart JJJJ) because they were installed prior to June 12, 2006.

In the warehouse/repair center, Mr. Brozik directed me to the paint booth used for refinishing parts. On the way to the paint booth I noticed several small (<50,000,000) natural gas-fired heaters used for space heating. These heaters appear to be exempt from the requirement in R 366.1201 to obtain a permit to install per R 336.1282(2)(b)(i).

In the refinishing area I inspected a spray paint booth which Mr. Brozik estimated was installed a few years ago. The filters in the paint booth were installed so that the exhaust system opening was completely covered. Mr. Brozik provided records of the VOC emissions from the spray booth (attachment 2), filter maintenance records (attachment 3), and SDSs for the coatings and cleaning solvents used (attachment 4). The VOC calculations and SDSs indicate the highest monthly coating usage for November 2016 through February 2018 was 23 gallons. It appears the spray paint booth I inspected is exempt from the requirement to obtain a permit to install per R 336.1287(2)(c).

According to Mr. Brozik, the Binks spray booth, permitted in PTI 375-77, had been removed from the facility and the spray booth I inspected was the only spray booth at the facility. I observed only one spray booth at the facility. I informed Mr. Brozik that PTI 375-77 could be voided.

Next Mr. Brozik showed me the Saw Room. In the Saw Room I observed four saws, two sanders, and one drill press. The emissions from the saws, sanders and drill press was released only to the general in-plant environment. This equipment appears to be exempt from the requirement in R 336.1201 to obtain a permit to install per R 336.1285(2)(l)(vi)(B). According to Mr. Brozik the Binks spray booth used to be located in the Saw Room and showed me on the ceiling where the exhaust for the Binks booth had been. I observed capped ventilation in the area identified by Mr. Brozik and did not see a Binks spray paint booth.

After inspecting the Saw Room I inspected the Repair Shop. In the Repair shop workers perform touch-up work on furniture. I noticed one gallon cans of Solvent Naptha, Denatured Alcohol, Acetone, and Lacquer Thinner as well as cans of spray paint. According to Mr. Brozik, the solvents are used for reducing powder dyes or for cleaning. Mr. Rob Jendrusik, Art Van, provided records (attachment 5) of the products used in the Repair Shop. These records include the initial threshold screening level (ITSLs) and initial risk screening level (IRSLs) for each component in the products. Based on the information in the SDSs and records provided, it appears Lacquer Thinner, Lacover, Rub Cut Oil, and Stripeeze contain ingredients with an IRSL. None of the solvents, based on the information in the SDSs and records provided, contain any ingredients with an ITSL or IRSL less than 0.04 micrograms per cubic meter. VOC emission records from the Repair Shop were not previously being kept. Mr. Jendrusik provided a spreadsheet (attachment 5) on April 20, 2018 that will be used to track VOC emissions. This spreadsheet contains information required in R 336.1290(2)(d) and (e). It appears the repair process appears will be exempt from the requirement in R 336.1201 to obtain a permit to install per R 336.1290(2). The use of spray paint cans in the Repair Shop appears to be exempt from the requirement to obtain a permit to install per R336.1285(2)(hh).

#### CONCLUSION

Based on the inspection, Art Van Furniture appears to be in compliance with the applicable air quality regulations. I requested AQD Permit Section to void the PTI No. 375-77 (attachment 6).

NAME

K. Kelly

DATE

4/11/18

SUPERVISOR

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