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

FACILITY: PANEL PROCESSING OF COLDWATER		SRN / ID: B6213
LOCATION: 681 RACE, COLDWATER		DISTRICT: Kalamazoo
CITY: COLDWATER		COUNTY: BRANCH
CONTACT: Jeffrey Meyers, Operations Manager		ACTIVITY DATE: 08/14/2014
STAFF: Dale Turton	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

An unannounced inspection was conducted at Panel Processing, Inc., to determine compliance with Michigan Air Pollution Control (APC) Rules and Opt Out Permit No. 601-77B. This company makes display panels and peg boards for retail stores. Both medium density fiberboard (MDF) and press board are used. Staff met with Jeffrey Meyers, Operations Manager. Chris Boyk, the Environmental Manager from the Alpena, MI headquarters was available by phone for assistance.

There are 3 buildings at this location. Plant 1 is the largest building that contains both board machining equipment and the board finishing line (coating) operation. Plant 2 contains the coating prep area and was not inspected. Plant 3 contains board machining equipment. Permit No. 601-77B is a facility wide permit that includes specific conditions for the finishing line and also HAP opt-out conditions for the entire facility.

Plant 1

This is the only building with any notable volatile organic compound (VOC) emissions. The following equipment is in this building:

EUCOATINGLINE

There are several stations in the line, all connected by conveyor. Stations can be either used or not used depending on the type of product that is being coated. The stations that are available are: Brush, reverse roll coater, oven, curtain coater, twin coater (reverse roll), oven, UV printer, top coater, and UV cure light.

Products used on the line include water based paint at 3% VOC, water based filler at 2% VOC, and UV Print Ink at 0.5% VOC. The company keeps records of the amount of coating used, the VOC content, the monthly VOC emission calculations, and the 12 month rolling emission calculations. The 2013 MAERS report shows that the VOC emissions from the coating line were about 7500 lbs. This complies with the 50 ton/year limit.

There is also an instantaneous material limit of 6, 10, or 12 pounds of VOC per 1000 square feet of board coated, depending on the type of board. This is based on the Rule 620 RACT rules. They can generate calculations showing compliance with the pounds per 1000 square feet limit on a longer averaging period, but instantaneous records are not being kept, as it would be burdensome. The recordkeeping section of the permit does not require them to keep records of the Rule 620 material limits. Now that this issue has been brought to the company's attention, they have already inquired with the AQD permit unit to have the instantaneous material limit removed from the permit. They would like to have limit added for a simpler pounds per gallon of coating as is in similar facilities they own in Michigan.

The stacks for the main oven and the UV lamp section are in place as required by the permit.

They are still using the same types of coating that were in use during previous inspections. They have added one more coating recently for a "Nofire Technologies" A18 ceramic intumescent fire retardant coating. The Nofire is a similarly low VOC coating.

Machining Operations

There are 4 routers, 3 schelling saws, 3 perforators, and 1 grinder. The dust drawn from the machines are directed to one of two baghouses located outside the rear of the building. Neither of the baghouses are currently

equipped with a differential pressure gauge, although the maintenance department plans to install them soon. The exhaust from both collectors has the capability to exhaust to the outdoors during the summer months, but they have chosen to have the cleaned air directed back into the plant on a year round basis. There were no leaks in the ductwork or in the collector housing during the inspection. This equipment is exempted from permitting per APC Rule 285 (I)(vi)(B).

The collected sawdust and the ground up material is transferred to an enclosed truck supplied by another company that repurposes the material.

Screen Printing

A very low VOC, UV cured ink is used on the screen printer. This is not used regularly.

Paint Booth

This is included in the EUCOATINGLINE, although it is not a part of the same line. This is a stand-alone booth used for edge banding of certain panels. It is not used all of the time. This booth could be removed from the coating line EU and be a stand-alone R290 source.

The filters were fairly loaded up during the inspection. They had planned to change them soon. The framework was also somewhat agape at one spot, thus allowing overspray to pass through unfiltered. The frame issue was repaired the day after the inspection and new filters were put in place. Pictures were sent. This is now in compliance.

FGFACILITY

No records provided for HAPs emissions. The company has committed to not having any HAPs in the coatings. The Material Safety Data Sheets we have on file do not list any HAPs. They are in compliance with the HAP opt-out conditions in the permit.

Plant 2

This building is used as a warehouse and as the paint mixing and preparation area (Paint Lab).

Plant 3

Stan Howver is the operations manager of this building.

No coating is performed in this building. This building houses machining operations used for the production of display racks, etc. There are six router machines, two schelling saws, and an edge foiler that are all connected to a common exhaust ductwork. A baghouse located outside the building controls the sawdust. This has the capability to exhaust outdoors during the warm months and indoors during the cold months. They are currently exhausting outdoors. There were no visinble emission observed from the exhaust point nor were there any leaks from the ductwork or baghouse housing. This equipment is exempted from permitting per APC Rule 285 (I)(vi) (B).

There is also edging banding machines used to affix the fabricated edging to the boards. The edging is affixed with hot melt glue. The hot melt process is exempted from permitting under APC Rule 287(i).

A grinder is used to reduce the size of larger waste pieces for disposal. This does not need to be controlled by the baghouse.

The collected sawdust and the ground up material are transferred to an enclosed truck supplied by another company that repurposes the material.

Hale Tuston NAME

DATE 8/20/2014 SUPERVISOR MQ 8 22/2014