

Cody

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

B621342060

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: 10/05/2017
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

This was not an announced inspection. Dennis Dunlap and Cody Yazzie were the inspectors for AQD. Mr. Jeffrey Meyers was the contact person for Panel Processing. The facility consists of three separate buildings: Plant 1, flat panel coating line; Plant 2, coating formulation area; and Plant 3, high pressure laminate line.

### Plant 1

This plant coats medium density fiber board and particle board. There is a reverse roll coater that applies a water-based fill coat. A curtain coater is used to apply a water-based base coat or clear coat. Before going through the reverse roll coater there is a panel cleaner to remove dust. There is also a pre-heat oven. After the curtain coater there is a final bake oven. There is a twin coater that is rarely used to apply the water-based base coat or clear coat. A design may be printed on the boards after the bake oven. This is done with a UV printer using UV inks. There is a flash conveyor and UV lights for curing the ink. There is an old top coater that is never used.

For the final product the boards may be cut to size or grooves applied. Wood working machines including the panel cleaner are connected to an outside dust collection system. This consists of two dust collectors. Sawdust is conveyed to semi-trailers. A trailer may be filled up in one week. The dust collectors are on an annual inspection cycle. No visible emissions were seen at the dust collectors. The dust collector is exempt by Rule 285(2)(l)(vi)(C).

The facility is covered by PTI 601-77C issued in 2014. This is an opt-out permit for HAPs with a 50 tpy VOC limit. There are three coating VOC emission limits depending on the type of panels being printed. The facility does not process natural finish hardwood plywood panels so these records are not kept. The facility does print interior panels and apply class II finishes. These records are being kept. The coating records were off slightly off on the % of VOC used in the coatings based on SDSs. The facility corrected these numbers. Based on records from 2016 and 2017, the facility was in compliance with the 50 tpy VOC limit and the pounds of VOC per 1,000 square feet emission rates.

According to the SDSs, there are no HAPs in the coatings or ink (less than 0.1%), so HAP calculations are not being done. Based on the records the VOC emissions from cleaners and thinners are less than 300 pounds per year. This includes isopropyl alcohol. Waste solvent is picked up by Young Environmental or Safety Kleen.

There is a condition in the permit to use Method 24 to determine the VOC content, water content, and density of coatings. The coatings used are water-based low VOC coatings containing 33-38% water. The ink is UV- cured. Method 24 may not be useful to test these coatings.

### Plant 2

Plant 2 is used to formulate the coatings for Plant 1, the Holland plant, and the Alpena plant. There is one inside the plant dust collector. It appears that this formulation activity may be exempt by Rule 287(2)(k). The contact person is Jerry Burch. The coating chemist is Mark Bunda, who works at the Holland Plant.

Coating is made in batches of from 250 to 750 gallons. Ingredients are added on a pound basis. For QA/QC the density of the batch may be checked. Laboratory analysis is not performed. As noted above, these are water-based, low VOC coatings. Method 24 may not be a useful test for these coatings.

### Plant 3

The contact person is Stan Hawver. This facility uses thick board medium density fiber board to attach a laminate. The glue that is used is DuraPro G-2360 SP IFS. This is a multi-purpose wood glue. Based on what has been ordered in 2017 (seven 55-gallon drums, a total of 385 gallons), it appears that usage is below 200 gallons per month. A lacquer thinner/diluent (Univar) is used to wipe down the boards. So far in 2017 four 55-gallon drums have been ordered (1,760 pounds of VOC). No paints are used. A hot melt glue may be used.

The DuraPro glue contains 47-50% water so for Rule 287 they would be allowed 300 gallons per month. It contains 2.24% VOC by weight. The 385 gallons purchased would contain about 8.6 pounds of VOC.

It appears that the current usage amounts per month of the glue and lacquer thinner would meet Rule 287 and Rule 290, respectively.

Wood working equipment is controlled by an outside dust collector. Maintenance is performed in fall and spring. Sawdust is collected in a trailer. The dust collector exhaust is checked once/day. The dust collector is exempt by Rule 285(2)(l)(vi)(C).

There is a trash compactor, a lathe, and welding equipment.

NAME Dennis Durlap

DATE 10/20/17

SUPERVISOR MA 10/23/2017