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

B661429618

FACILITY: Holland Panel Products		SRN / ID: B6614
LOCATION: 615 E 40th St, HOLLAND		DISTRICT: Kalamazoo
CITY: HOLLAND		COUNTY: ALLEGAN
CONTACT: William Kok , General Manager		ACTIVITY DATE: 05/27/2015
STAFF: Dale Turton	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

An unannounced inspection was conducted of this panel manufacturing and coating facility. The facility is an ROP source and is operated under permit # MI-ROP-B6614-2012. The facility manufactures store fixture boards using MDF. This includes pegboards and slotted boards.

The facility operates one coating line, various wood working machines, and a paint room.

EU-PAINTLINE1

This conveyorized line was reconstructed in 2011 using components from the former line 1 and 2. The stations in the line are: reverse roll coater, UV lamps, denibber, reverse roll coater, UV lamps, gas oven, denibber, gas fired IR oven, curtain coater, gas oven, 4 stage printer, top coater, UV lamps, cool-down conveyor.

All coatings are water based with some containing only a very small amount of VOC. They are keeping monthly records of coating usage and VOC contents, and emission calculations. Records are also kept for HAPs usage. The usage amounts are tracked at the plant and the reports are compiled by Chris Boyk at the company headquarters in Alpena. The 12-month rolling VOC emissions are in compliance with the permit limit. All of the coatings (curtain coating, top coating, fillers) and the inks are less than 1.0 pounds of VOC per gallon.

Acetone is used for cleanup. Records are being kept showing that they are complying with the emission limit.

All stacks are exhausted unobstructed upwards through the roof with one exception. The printer cure exhaust is sideways through the wall.

There are also two denibbing stages that are vented to a cartridge filter. This filter is a FARR Camfil model with ten cartridges. This has a differential pressure gauge installed to measure the pressure drop across the filters. The denibbers were not being used during the inspection, so the filter was not being used. It is internally vented. This is exempt from permitting using Rule 285(vi)(B) since it is located inside and internally vented.

FGNESHAPS

This is a wood products NESHAPS source due to the historical use of HAP containing materials. They are still subject due to the "once in, always in" EPA policy.

The paint line and the edge coating operation are included in this group. The Wood Building Products NESHAPS (Subpart QQQQ) requires them to choose a compliance option. They are using the "emission rate without controls" option. This allows averaging the usage of all coatings together to meet a limit. They are keeping records of the monthly usage of the coatings, and the resulting HAPs emissions in order to comply with the NESHAPS coating limit. They semi-annual report shows that they are in compliance with the 1.53 lb HAP/gal solids limit for interior wall paneling or tile board.

Rule 287 Paint Booth (FG-RULE287(c)

A small exhaust fan with a filter frame is installed in the corner of a back room. This room is used for spraying or rolling a coating on the edges of stacked panels. This is a very low volume usage operation. The exhaust is through the wall and discharges at ground level. Proper records are being kept of usage and emissions. Less than 200 gallons per year are used. This area is not currently being used since the area is needed for temporary storage of other equipment.

Woodworking - FGPARTICULATE

The woodworking operations consist of the following:

Slotwall Router – This is exhausted to one dedicated baghouse. The exhaust is sent back into the building. This baghouse is equipped with a differential pressure gauge. There was no evidence of leaking from the ductwork or baghouse housing.

2 CNC machines – This is exhausted to a baghouse. This baghouse is equipped with a differential pressure gauge. There was no evidence of leaking from the ductwork or baghouse housing. The exhaust is sent to the inlet of a second baghouse (described below).

2 Saws, 2 CNC machines, 2 perforator, 1 edgebander, and 1 double end tenoner– The ductwork for this woodworking equipment is combined with the exhaust from the aforementioned baghouse and is exhausted to a baghouse. This baghouse was recently installed as a replacement for an older baghouse. Rule 285(f) allows for replacement air pollution control equipment without a permit. The exhaust is sent back into the building. The differential pressure gauge was reading 0.55 inches of water. Condition III(2) of the ROP requires a working pressure drop gauge. There was no evidence of leaking from the ductwork or baghouse housing.

NAME Dale Juston DATE 6/2/15 SUPERVISOR MM 6/5/2015