

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

B661459164

FACILITY: Holland Panel Products		SRN / ID: B6614
LOCATION: 615 E 40th St, HOLLAND		DISTRICT: Kalamazoo
CITY: HOLLAND		COUNTY: ALLEGAN
CONTACT: Chris Boyk , Project Engineer		ACTIVITY DATE: 06/03/2021
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On June 3, 2021 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 615 East 40<sup>th</sup> Street, Holland Michigan at 2:00 PM to conduct an unannounced air quality inspection of Holland Panel Products (hereafter HPP). Staff made initial contact with the office receptionist and stated the purpose of the visit. Morris Rios, HPP, Operations Manager, is the new contact and arrived shortly thereafter and took staff to his office for further discussions. Chris Boyk, HPP, Chief Engineer was also present for discussion regarding facility records and the walk-through inspection.

HPP is a stationary source that as of the 2019 inspection had 16 staff members that operate on 1-ten hour shift five days a week. The facility uses fiberboard, hardboard, and particle board to manufacture store panels and fixtures that are often used by store chains and display designers. Woodworking equipment, including saws, routers, drills, and perforating stamp machines are all controlled by baghouses. These fabric filter control devices are located outside, but vent back inside the building area. The wood panels are finished on a conveyerized line. Water based coatings, ultraviolet (UV) coatings, and fillers are used in the process. Stations in the line may include, cleaning, roll coating, UV cure oven, sanding, IR curing, curtain coating, printing, and a gas fired curing oven.

It was discussed during the inspection that HPP did intended to apply for an Opt-Out Permit. Staff mentioned that the facility does have an expiration date of May 25, 2022 for their current ROP. Staff discussed with Mr. Boyk and Mr. Rios that a complete ROP application would still be required for the facility if a valid Opt-Out Permit was not issued to HPP before May 25, 2022. Staff suggested to submit the application as soon as possible to avoid any issues with the ROP expiration date of their current ROP. As of July 12, 2021 permit section had received a PTI application.

HPP was last inspected by the AQD on March 28, 2019 and HPP appeared to be in Compliance at that time with MI-ROP-B6614-2017. Staff asked, and Mr. Rios stated that the facility does not have any emergency generators or cold cleaners.

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

#### EUPAINTLINE1:

This emission unit is a conveyerized process with numerous stations. The different stations include: two reverse roll coating (RRC), two ultraviolet cure ovens, sander, preheat oven, two denibber stations, curtain coater, direct roll coaters, base coat oven.

EUPAINTLINE1 is required to track the monthly and 12-month rolling VOC emissions that are emitted from the use of the water based and UV coating that are applied. HPP is keeping monthly usage records that include a description of the coating used and item identification number. For each coating the density and VOC emission factors in both lbs/gallon and lbs/gallon minus H<sub>2</sub>O. These emission factors come from the supplier SDS sheet. Staff checked item identifications: P51237, P50538, P51995, P52045, P51690, P50939, P5001, RM-WHITE BASE.

A review of the water base coatings with the following item numbers P50001, P50939, P50538, P51237, and RM-WHITE BASE showed that the density, VOC lbs/gal density recorded, VOC lbs/gal minus water density, and HAPs lbs/gal density were calculated and inputted correctly based on the provided SDS. HPP uses 0.0025 lbs HAPs/gal density for P50001 which comes from formaldehyde having a 0.02% weight by weight. HPP records showed that P50939 uses a 0.000209 HAPs lbs/gal density was calculated from the SDS providing that there is 0.00217% HAP content in the product. When reviewing P50538 it showed that HPP uses 0.013 lbs HAPs/gal which is calculated from using the 0.12246% by weight data from the SDS. HPP calculated 0.011 lbs HAPs/gal for P51237. This is calculated using 0.10529% by weight HAPs data from the SDS. RM-WHITE BASE SDS indicates that there 0.00000% HAPs by weight. All the HAPs densities appear to be calculated correctly using the provided SDS data.

Staff also picked a select few UV coatings that HPP keeps records for future or past usage. The UV coatings that HPP uses are high in solid content. Both P51995 and P52045 had SDS sheets indicating that they are 100% solids material and have no HAPs or VOCs material. P51690 uses the correct density, VOC lbs/gal density recorded, VOC lbs/gal minus water density, and HAPs lbs/gal density based on the provided SDS.

HPP calculates its 12 month rolling VOC emissions by combining VOC emission from both UV and Water-based coatings. From January 2020 through May 2021 the facility never had VOC emission above 3.5 Tons/year. This is well below the 25 Tons/year 12-month rolling time period limit.

HPP also has a VOC material limit for their coatings used. This is an instantaneous limit which must be complied with at all times. The maximum lbs VOC/gallon minus H<sub>2</sub>O that was used at the facility was 0.914 lbs VOC/gallon minus water. This VOC density is associated with the RM-ALABAMA WHITEBASE. This is compliant with the 1.0 lbs VOC/gallon material limit used in EUPAINTLINE1. From staff reviewing the previously identified products to be accurate the facility appears to be compliant with the VOC material limit in Special Condition II.1.

The facility is also required to track Acetone usage. The facility is keeping a 12-month rolling of Acetone emissions. For the year 2018 HPP never used more than 2.16 tons per year of Acetone emissions. This is below the 3.3 tons/year Acetone limit that specified in Special Condition I.2.

The facility is required to capture all waste materials and store them in closed containers stated in Special Condition III.1. The facility appears to be capturing all waste materials. HPP drains the waste solvents into a container that are kept fully closed and shipped as waste about every six weeks by young environmental. From Staff observations HPP appeared to be complying with Special Condition III.2 by keeping all VOC containing material covered to minimize fugitive emissions.

The facility did previously obtain the ability to use SDS sheets for VOC data rather than Method 24 testing data. This request was approved on August 19, 2003, however the request was for Line 2 coating line that was associated with PTI No. 192-02 that no longer exist. Since then, the new EUPAINTLINE1 has been installed under PTI No. 209-10 and rolled into the ROP. The new 209-10 had similar language requiring approval from the Air Quality Division to use the SDS data information for calculations rather than the Method 24 Testing data. Since the approval was for the old Line 2 and not EUPAINTLINE1 Staff has suggested to HPP that they submit a request for approval to use the SDS data as in accordance with the PTI No. 209-10.

#### EUEDGECOAT:

EUEDGECOAT is a spray application coating unit that operates under Exemption Rule 287(2)(c). This process is used to apply coatings to the edges of stacked panels. The facility is keeping monthly records for this operation. Staff reviewed Rule 287(2)(c) exemption records from January 2020 through April 2021. Records showed that the facility's largest monthly coating usage occurred in July 2020 in which the facility used roughly 15.54 gallons. This is well below the 200 gallon per month limit.

This emission unit is located in a separate coating bay. The bay has an exhaust fan that discharges through the wall at ground level that is covered with a particulate filter. The condition of the particulate filter was used but did not appear torn or ripped. Staff mentioned to Mr. Rios and Mr. Boyd that the condition of the filter appeared to be acceptable, but as a reminder part of the condition requires to maintain the filter in good working condition.

#### FGNESHAP:

The facility is subject to 40 CFR Part 63, Subpart QQQQ. This NESHAP applies to facilities that applies surface coating of wood building products.

As a part of this NESHAP the facility must comply with an Organic HAP emission limit. The emission limits are based on the subcategory of the wood building product that the facility is producing. The two subcategories that could be produced at the facility are interior wall paneling and tileboard and other interior panels. The facility demonstrates compliance by complying with the more stringent limit of 0.17 lb HAP/gallon solids associated with the subcategory "Other Interior Panels".

The company has been electing to comply with compliant materials option. For this option the HPP calculates the 12-month rolling emission rate is less than or equal to the 0.17 lb HAP/gallon

solids. Staff reviewed the 12-month rolling lb HAP/gal Solids content for the coatings from January 2020 through April 2021. The facility reported a maximum 12-month rolling emission rate to be 0.00108 lbs HAP/gallon solids in February 2021. This is well below the 0.17 lb HAP/gallon limit. The largest monthly was recorded in February 2021 with 0.0022 lbs HAP/gal Solids in that month.

This regulation also has a material limit that requires no usage of organic HAP's in each thinner or cleaning material that the facility uses. The facility currently only uses four different cleaning materials. The facility uses Methyl Ethyl Ketone (MEK), 2-butoxyethanol (Ethylene Glycol Monobutyl Ether), Isopropyl Alcohol (IPA), and Acetone. None of these cleaning materials are considered HAP's. Both MEK and 2-Butoxyethanol have been removed from the EPA's HAPs list. MEK was removed in December 2005 and 2-butoxyethanol was removed in November 2004.

**FGPARTICULATE:**

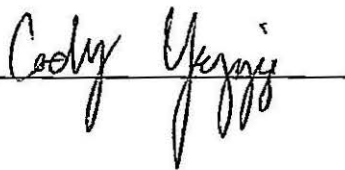
FGPARTICULATE is a collection of woodworking units that are used to saw, machine, and perforate the panel boards. These units appear to operate under exemption Rule 285(2)(l)(vi)(B). The facility has two baghouse units. The West unit is a dedicated unit that controls the Slotwall Router. The East unit combines ductwork from the saws, a CNC machine, punch presses, and a few routers. Both units are equipped with a differential pressure gauge and have the exhaust sent back into the general in-plant environment.

**MONCO LAMINATOR:**

This unit is a lamination unit that has a pre applied adhesive hot melted on during the lamination process. The unit is equipped with a small internally vented baghouse. The baghouse is used to collect dust debris that come off in the shipping and handling. The emission unit appears to meet exemption Rules 287(2)(i) and Rule 285(2)(l)(vi)(B).

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 MI-ROP-B6614-2017. Staff stated to Mr. Boyk that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 3:30 PM.-CJY

NAME



DATE



SUPERVISOR

