

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

N084128825

FACILITY: Ros's Cabinets Inc.		SRN / ID: N0841
LOCATION: 15065 32 MILE, ROMEO		DISTRICT: Southeast Michigan
CITY: ROMEO		COUNTY: MACOMB
CONTACT: Adriana Sarti ,		ACTIVITY DATE: 03/02/2015
STAFF: Joyce Zhu	COMPLIANCE STATUS: Pending	SOURCE CLASS: SM 208A
SUBJECT: Annual Inspection		
RESOLVED COMPLAINTS:		

On 3/2/2015, I conducted an annual inspection at Ros's Cabinets Inc., located on 15065 32 Mile Rd., Romeo. Kerry Kelly from AQD accompanied me during the inspection. We arrived at the site around 10:21 AM. I introduced ourselves to Ms. Adriana Sarti from the company & explained the purpose of the inspection. Ms. Sarti asked why we would conduct the inspection so soon since I was there just the year before. I explained because there are four spray booths onsite; with potential coating usage of maximum 200 gallons of coatings from each booth (Rule 287(c) exemption) & no legal restrictions on the HAP emissions, the potential to emit from the company could put the source into a major source category. As a result, we need to conduct another inspection.

Inspection:

The company is in the cabinet making business. They have been in this location since late 80's. There are four booths on-site. Other than coating operation, there are three sanding machines & some sawing as well as cutting machines. The exhausts of all of these machines are controlled by dust collectors; the emissions from the dust collectors are vented back into the plant environment; as a result, these processes are exempted from permit to install requirements according to Rule 285.

Permit # 522-84

This permit covers a paint spray booth for the location; however, there are four booths onsite. At the beginning of the inspection, Ms. Sarti stepped away & had Mr. Rino Formicuccia, the plant manager, took us to see the coating process. During the inspection, they painted wood panels in three of the four booths. Some of the filters were either missing or not placed properly while they were painting. After I pointed the practice to Rino, he immediately had the painters to put the filters back & pulled the rest of the filters to cover the exhaust areas. There was some overspray inside the booths. They used air assist applicators for the painting process. The spray guns are cleaned by thinners. Waste solvents were stored in 55-gallon drums which will be shipped away by a waste hauler. Paints were stored in closed containers inside flame proof steel cabinets at the back of the building. According to Ms. Sarti, they operate the two small booths 2 – 3 hours a day & 5 -6 hours for the big booths. On an average, they finish three kitchen cabinet jobs a week. At the end of the inspection, I asked paint usage record from the coating operation. On 3/17, Ms. Sarti sent me the coating usage via an email. The data shows that the company has used less than 150 gallons totally from all four booths per month since January 2014. Clearly, these booths could be exempted from the permit requirement according to Rule 287(c). Because there are four booths onsite, the potential coating usage can be as high as 800 gallons per month per Rule 287. Let's taking worst case scenario, Rule of thumb of VOC content of the coatings is 7.36 lbs/gal. The potential of VOC emission can be as high as 2.94 tons

per month; as a result the emission during 12-month rolling time period, could be over 35 tons. Because the company has not obtained any enforceable restrictions on HAP emissions, the VOC emission could be treated as HAP emissions. This would put the company into the major source category. During my inspection, I explained the scenario to the company & advised the company to obtain an opt-out permit in order to get out of Title V obligation.

In conclusion, they use small amount of paints in each booth according to their usage record; I won't take any enforcement action against the company for now. I'll encourage the company to get an opt-out permit in order to avoid Title V regulations. I'll follow up with the company regarding to the permit issue. If the company will not apply for the permit, nor will they submit a ROP (Renewable Operational Permit) application in the next few month, I'll send them a violation notice (VN).

NAME Joyce [Signature] DATE 3/17 SUPERVISOR CJE