

Plant

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

N111024055

FACILITY: TADD Industries Inc.		SRN / ID: N1110
LOCATION: 1239 Comstock St., MARNE		DISTRICT: Grand Rapids
CITY: MARNE		COUNTY: OTTAWA
CONTACT: Bob Tomlinson , Project Manager		ACTIVITY DATE: 01/09/2014
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Bob Tomlinson, Project Manager. Mr. Tomlinson was presented with the DEQ Environmental Inspections: Rights and Responsibilities Brochure and its contents were discussed. TADD Industries, Inc. is a wood manufacturing job shop that works mainly with hardwoods, but does also provide products as necessary of substrate wood products. The facility operates a baghouse that is permitted under Permit to Install (PTI) No. 292-85 and a wood products coating process permitted by PTI No. 291-85A.

In 2005 the facility provided a demonstration to the AQD that the facility is a true minor source of air pollutants, including Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP).

The facility has not acquired any new equipment since the last AQD inspection in 2005. There is equipment that is no longer utilized including the linear panel line and one of three spray booths. Two spray booths are being used for the stain and topcoat wood coating operation. This is utilized approximately two hours per day, and mainly applies solvent based stain and top coat (varnish/laquer).

During the opening meeting, staff presented Mr. Tomlinson with copies of PTI No.s 292-85 and 291-85A. The requirements of each were discussed and Mr. Tomlinson indicated that usage is down quite a bit from previous years but actual usage was not being maintained other than with purchase records. The PTI No. 291-85A also requires 12-month rolling VOC data be maintained. Staff explained that this was a violation of the permit, and a Violation Notice would be sent.

Next we went on a plant tour. Mr. Tomlinson maintains the baghouse in PTI No. 292-85 utilizing a facility maintenance program which includes annual inspections by an outside contractor and routine maintenance as needed. The return air filter is changed weekly. In the winter months, the air from the baghouse is recirculated through the facility natural gas fired boiler used for heat. In the summer, it is vented externally. The wood working area looked well maintained, with adequate particulate collection.

The facility uses mostly pre-catalyzed materials in the spray booths, which can be directly applied from the container as opposed to having to be mixed on-site. The filters appeared in good repair and the operators can use working manometers to gauge filter replacement.

During the closing conference, Mr. Tomlinson asked the owner of the facility, Dan Dupre to join us for a summary of the inspection. Staff explained that the facility is in non-compliance due to failure to maintain records of emissions and usage. However, both Mr. Dupre and Mr. Tomlinson indicated that the company will strive obtain compliance in short order. Staff informed them of the AQD expectation of the company following the receipt of the Violation Notice is to respond promptly with a plan to return to compliance.

Staff will provide the facility with the DEQ Clean Air Assistance electronic spreadsheet for maintaining required records, and the contact number for free, non-regulatory small business assistance which is 1-800-662-9278.

The facility was in non-compliance and a Violation Notice will be sent.

NAME Paul Luzzan

DATE 1-14-14

SUPERVISOR PAB