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

N145762921		
FACILITY: Fleetwood Group Furniture		SRN / ID: N1457
LOCATION: 11832 JAMES ST, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Brent Nienhuis, Operations Engineering Manager		ACTIVITY DATE: 05/19/2022
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced inspection to verify compliance with applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

Chris Robinson (CR) from the Department of Environment, Great Lakes, and Energy's (EGLE) Air Quality Division (AQD) was on site to conduct an inspection of Fleetwood Group Furniture (SRN N1457) on May 19, 2022. The facility is located at 11832 James Street, in Holland, Michigan. Prior to arrival CR observed the facility from the north along James Street and from the east along Helen Court.

Weather conditions were hazy with a temperature of approximately 56°F and southerly winds at 13 mph. No visible emissions or odors were observed.

CR entered the facility and met with Brent Nienhuis, Furniture Operations Engineer and later with Brian Harvey, VP Engineering for Electronics and Travis Wilson, VP of Operations for Electronics. Identification was provided to all, and the purpose of the visit was explained, which was to conduct an inspection of the entire facility to verify compliance with applicable air quality rules and regulations. Mr. Nienhuis provided a walkthrough and pertinent information pertaining to Fleetwood's Furniture Division while Mr. Harvey and Mr. Wilson provided a walkthrough and pertinent information of Fleetwood's Small Electronics Division.

The type of furniture manufactured in the Furniture Division is primarily for the educational environment which consists of both laminate coated manufactured board and metal components. The manufactured board is purchased with the laminate already adhered to it which is cut to shape using various woodworking equipment including saws, routers, and sanders. Once to proper shape and size staff apply edge banding using a hot melt adhesive. Dust collectors that are located inside the building and only vent to the in-plant environment are used to control dust from the various equipment. The wood working equipment appears to be exempt from Rule 201 permitting requirements per Rule 285(2)(I)(vi)(B) and the application of the hot melt adhesive appears exempt per Rule 287(2)(i).

Metal components are mig welded together cleaned and then powder coated. The wet coating operations have been completely replaced with powder coating. The powder coating line consists of a conveyor for hanging the components on, a phosphate wash for cleaning, a drying oven, and then the powder coat booths. The booths are vented to the in-plant environment and utilize cartridge style filters which were well maintained. Welding appears to be exempt from Rule 201 permitting requirements per Rule 285(2)(i) and the powder coating line appears exempt per Rule 287(2)(d).

The small Electronics Division manufactures custom PCBA assemblies which includes surface mount populating (pick and place), a wave soldering unit, a selective soldering unit with reflow oven (electric), and an optical unit. The facility is in the process of obtaining components for a second

line. These units appear to be exempt from Rule 201 permitting requirements per Rule 285(2)(i). The use of a conformal coating was discussed. At this time Fleetwood does not use it but is considering it. Conformal coating is a coating applied to the boards for corrosion protection and may be exempt per Rule 201 permitting per Rule 287(2)(c) if usage does not exceed 200 gallons per month. CR discussed this along with record keeping requirements. Potential use of an RTV sealant was also discussed and Rule 287(2)(c) may also be adequate. Since RTV is an adhesive Rule 287(2) (a) may also be appropriate if usage does not exceed 2 gallons per day. However, CR informed Mr. Wilson and Mr. Harvey that the onus is on the facility if they decide to use a permit exemption.

Per onsite observations and discussions with staff Fleetwood appears to be operating in compliance with applicable air quality rules and regulations.

NAME

DATE 6/1/22 SUPERVISOR