

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

N233041024

FACILITY: GREAT LAKE WOODS INC		SRN / ID: N2330
LOCATION: 3303 JOHN F DONNELLY DR, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT: Steve Rapisarda , Facilities Manager		ACTIVITY DATE: 08/04/2017
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Minor source inspection (particulate). Two permitted wood dust collection systems and an exempt baghouse. FY17		
RESOLVED COMPLAINTS:		

Background

Great Lake Woods (Great Lake) SRN: N2330 is a wood furniture manufacturing facility. The facility manufactures molding, kitchen, bath and office furniture. The production facility is located at 3303 John Donnelly Drive, Holland, Michigan. Great Lake is located in a primarily commercial area with the nearest residential structure approximately 750 feet south of the facility. The facility was inspected on 8/4/2017 by Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division. The intent of the inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, Michigan's Air Pollution Control Rules, PTI No. 197-12 and PTI No. 1008-89. The facility also has a permit exempt (less than 50,000 CFM) baghouse pursuant to Rule 285(2)(1)(vi)(C) as previously determined by MDEQ EQA, April Lazzaro. Great Lake Woods is a minor source of particulate matter under 10 microns in size (PM-10) and particulate matter less than 2.5 microns in size (PM-2.5).

Inspection

Site arrival was at 10:30 am on 8/4/17. Upon arrival I presented my State of Michigan identification card, informed the facility representative of the intent of my inspection and was permitted onto the site. President and CEO Keith Malmstadt showed me the facility. The facility contact, Steve Rapisarda was not on site during my inspection. Steve Rapisarda is Great Lake Woods' Facility Manager who normally assists with compliance. Before we went into the production area, Keith briefly described the facility's processes. Great Lake manufactures hardwood furniture. This process involves a significant amount of wood cutting, grinding and sanding. All of the relevant processes that generate wood dust are controlled by three dust collectors. Each piece of equipment is connected to a vent that feeds through the building to the dust collectors. The three dust collectors are located on the south west side of the building. Associated with the dust collectors are collection bins that are used to store the dust. After discussing the process Keith indicated that Great Lake Woods has experience a decrease in production over the past 3 years. The facility currently processes 20,000 board feet of lumber per day. Keith then took me to the production area to inspect the facility and to inspect the bag houses and the dust storage area. The general plant area consisted primarily of CNC machines, saws, grinders that vent to the three baghouses.

PTI 197-12

This permit covers the large dust collector (Dustar Dust Collector). The primary restrictions set by the permit are on hours of operation vented to the outdoor ambient air as well as opacity limits. This process equipment filters wood particulate generated by sawing operations, hand orbitals, planers, routers and drills. Special condition two limits the visual emissions from EUWOODWORKING to a six minute average of 5% opacity. The facility was venting the baghouse internally. I did not read opacity from within the building, but if the facility were having issues with baghouse filtration the dust would very evident inside. Great Lake appears to meet this limit set by the permit.

Process and operational limits are set by the PTI. The permit states that the permittee shall not operate EUWOODWORKING while venting the baghouse dust collector into ambient air for more than 7333 hours per 12-month rolling time period as determined at the end of each calendar month. Great Lake limits their venting to five days per week at 18 hour days during the summer months. Great Lake does this in addition to their permit, to save on heating costs during the colder months. After the inspection, on 8/8/2017 I called Steve Rapisarda and asked him about the external venting. He stated that the facility only vents externally from May through the month September (for a total of five months). When calculated, the total outdoor venting is approximately 2035 hour of the 7333 hour limit per 12 month rolling. The calculation assumes 5 days a week with 18.5 hour work days for 153 days. If the usage were more conservatively calculated at 365 days a year, 5 days a week with an 18.5 hour limit the facility would only still only use 4823 hours of the permitted 7333 hours. So long as the facility's work hours and usage rates do not change, Great Lake would appear to meet this limit of the permit.

The permit requires that the permittee shall not operate EUWOODWORKING unless the baghouse dust collector is installed, maintained, and operated in a satisfactory manner. In addition to regular maintenance of the baghouse, the maintenance manager also indicated that they clean the dust collection area regularly. The previous AQD inspector April Lazzaro indicated in her violation notice dated December 11, 2012 that the house keeping around the bag house and the trailers was poor. In response to the violation Great Lake indicated that they would implement regular scheduled cleaning. At the time of my inspection there was some wood dust spilled around the collection trailer. The material spillage was not too significant in volume. Keith informed me that the material had spilled last night and they would clean it today. I informed Keith that the area needed some cleaning and should be cleaned as soon as reasonably possible. The material spillage was not significant enough to warrant a violation of the condition of the permit.

The monitoring and record keeping section of the permit requires that the permittee maintain in a satisfactory manner, the number of hours the baghouse is vented to the ambient air on a 12 month rolling time period basis. Great Lake informed me that they vent the baghouse Monday through Friday, 18.5 hours a day, from May through the end of September. I discussed this with Steve during my phone conversation on 8/8/2017. So long as the facility is aware of the regular scheduled usage of the external venting the facility may be able to track their hours used in this manner. The facility is currently using 27% of their permit limit and it does not appear that under their normal operational conditions that they will exceed the permit limit. This appears to be an acceptable method of recording the facility's activities and appears to comply with the permit.

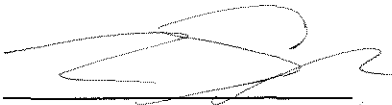
PTI No. 1008-89

This permit to install covers the Pneumafil Reverse Air Filter (baghouse 34,000 CFM). The special condition 15 of PTI No. 1008-89 requires that the baghouse not emit opacity in exceedance of 0% opacity. As previously discussed in the above paragraph, Great Lake was venting internally and I did not observe any particulate matter build up in the facility. Great Lake appears to be meeting the requirements of this special condition.

In addition to the opacity limitation the permit requires that the baghouse is maintained and operated appropriately. In combination with regular maintenance of the baghouse and my dust observations it appears that Great Lake is meeting the requirement of this condition.

Conclusion

It appears that Great Lake is in compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, Michigan's Air Pollution Control Rules and the conditions set by PTI No. 197-12 and PTI No. 1008-89.

NAME 

DATE 8/29/17

SUPERVISOR 