

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

N508647728

FACILITY: R J WOODWORKING		SRN / ID: N5086
LOCATION: 3108 WHITEHALL RD, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: Bob Carter, CEO		ACTIVITY DATE: 02/05/2019
STAFF: Chris Robinson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY'19 on-site inspection to determine the facility's compliance status with applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

AQD staff, Chris Robinson (CR), conducted an unannounced scheduled on-site inspection of RJ Woodworking Inc. located at 3108 Whitehall Road in Muskegon, Michigan on February 5, 2019 from approximately 1:30pm to 2:30pm. CR met with the company's CEO, Mr. Bob Carter, AQD identification was provided and CR announced intent to conduct an inspection of the facility in order to determine RJ's current compliance status with respect to any applicable air quality rules and regulations. Mr. Carter provided pertinent information and a tour of the facility.

Weather conditions were approximately 30°F with east winds at approximately 6mph with no precipitation (www.weatherunderground.com). CR surveyed the perimeter of the facility, upon arrival, for odors and visible emissions, none were observed.

FACILITY DESCRIPTION

RJ is a custom wood furniture/part manufacturer specializing in thermoforming. The facility does not have an active Permit to Install (PTI). All of the equipment and processes are operated under the Rule 201 permit exemptions discussed below.

COMPLIANCE EVALUATION

Mr. Carter indicated that there has not been any major equipment changes since the previous inspection conducted on April 24, 2007. The facility operates both manual and automatic equipment, such as CNC machines, for cutting, milling and sanding MDF plywood and Hardwood. This equipment is either vented to an indoor dust collector or to one of two (2) outdoor baghouses. Both the dust collector and the baghouses are vented to the general in-plant environment, therefore exempt from Rule 201 permitting requirements per Rule 285(2)(l)(vi)(B) for "equipment that has emissions that are released only into the general in-plant environment". Some sawdust was observed near the baghouse collection bins and the trash dumpster where the sawdust is disposed of. CR informed Mr. Carter that some housekeeping is required to clean up the sawdust and a follow-up visit may be conducted.

This facility has two (2) large manual spray booths and one (1) small manual spray booth. One of the large spray booths, which was operating during the inspection, also includes an electric warming/curing oven used to speed up the drying process of any applied coatings, except for adhesives. Mr. Carter indicated that all coatings used are now water-based and RJ primarily sprays adhesives for the thermoforming process, which consists of an electric thermolaminator for applying vinyl covering to wood which is exempt from 201 permitting requirements per Rule 286(2)(c)(d) for plastic thermoforming equipment. Each spray booth is operated under exemption Rule 287(2)(c), which allows a coating line to be exempt from Rule 201 permitting requirements, only if the usage does not exceed 200 gallons per month per emission unit. Mr. Carter provided usage records (Attached), which are based on purchase orders. None of the booths used more than 200 gallons per month from January through December of 2018. The months with the highest usage were November and December of 2018 at 40 gallons for Booth #1. Dry filters were in place and appeared to be properly maintained.

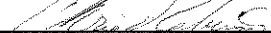
Facility heat is generated by a wood waste boiler. Mr. Carter indicated that this is the same boiler that was observed in the April 24, 2007 inspection which previously identified the boiler as having a heat input capacity of less than 6,000,000 Btu per hour. The boiler is operated under Ruel 201 permit exemption Rule 282(2)(b)(iii) which allows for fuel burning equipment used for space heating as long as it burns only the following fuel:

"Wood, wood residue, or wood waste that is not painted or treated with wood preservatives, which does not contain more than 25% plywood, chipboard, particleboard, and other types of manufactured wood boards, that is not contaminated with other waste materials, and the equipment has a rated heat input capacity of not more than 6,000,000 Btu per hour."

A letter was sent to Mr. Carter on May 8, 2007 from the AQD, informing him that this exemption allowed for the burning of no more than 25% manufactured wood board as long as it's not contaminated with other waste material. CR inspected the boiler and wood piles, which consisted of tree stumps and logs. A bin of scrap material was also observed, which per Mr. Carter, is only used for kindling. The bin consisted of hardwood and, what appeared to be less than 25% manufactured board (MDF particle board).

COMPLIANCE DETERMINATION

Based on observations, discussions and usage records, RJ appears to be in compliance with applicable air quality rules and regulations.

NAME DATE 2/12/2019 SUPERVISOR 