DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

FACILITY: Rivershores Building Products, Inc.		SRN / ID: N5884
LOCATION: 100 ANILINE AVE N, HOLLAND		DISTRICT: Grand Rapids
CITY: HOLLAND		COUNTY: OTTAWA
CONTACT:		ACTIVITY DATE: 02/01/2019
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY 2019		
RESOLVED COMPLAINTS:		

Clean Air Act Inspection report for Rivershores Building Products, Holland, Michigan

Facility Background

Rivershores Building Products is a manufacturer of wood flooring. The facility is primarily a flooring retailer but also periodically pre-stains some flooring.

Rivershores Building Products is not subject to the Title V program, which is discussed below, in the regulatory analysis section of this report.

Compliance History

The facility has not received any violation notices from the AQD in the past five years. The facility was recently permitted and has not been inspected at this location in the past by the AQD. The facility was previously located at 6227 136th Ave, Olive Township (SRN N6936). That facility was inspected in FY 2014 and was found to be in compliance at that time.

Location

Rivershores Building Products located at 100 Aniline Ave, Holland, Michgan. This area is a primarily residential with some industrial property. The nearest residential structure is approximately 325 feet to the east of the facility.

Introduction and purpose of inspection

On 2/1/2019 Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division conducted an unannounced, scheduled inspection of Rivershores Building Products. The MDEQ inspected the facility located at 100 Aniline Ave, Holland, Michigan.

The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and PTI No 171-17.

Observations and facility processes

AQD staff met with Kelly Turkopp, Office Manager, presented their identification and informed the representative of the intent of the inspection. The facility representative agreed to show the AQD the facility and its processes. Rivershores Building Products sells wood flooring and also pre-stains floors. The facility's main permitted process has not been installed at the facility. The facility had the equipment moved on site, but it is currently unassembled in shipping containers.

While on-site I reviewed the facility's records of coating usage. Kelly indicated that instead of installing the equipment, they did the work manually and hand applied coating. The facility's actual coating usage is moderately low as indicated in their records. I asked Kelly to show me the facility and she arranged to have the Assistant Operations Manager, Brian Goosen show me around. Brian was not on-site at that time and I agreed to leave and return to meet with him once he arrived.

After returning, I met with Brian and informed him of the intent of the inspection. Brian showed me the back section of the facility which is primarily used for storage of sales products. He informed me that this was were they would set up their temporary work area and hand apply coatings. After inspecting the area Brian showed me the equipment in the shipping containers. The equipment was disassembled and did not appear to be operational. I asked Brian if I could take photos of the equipment and he permitted me to do so. After observing the equipment, I discussed the MDEQ Rules pertaining to installation equipment and that if the equipment is not installed the permit will be voided. General Condition 2 of PTI 171-17 indicates that if the equipment is not installed within 18 months of the permit issuance (December 20, 2017) the Department will void the permit.

Regulatory analysis and compliance evaluation

Facility emission category

Rivershores Building Products is an opt out source for hazardous air pollutants (HAPs). PTI No. 171-17 establishes a facility wide (FG-Facility) aggregate HAP limit of 22.4 tons per year (tpy) and a single HAP limit of 8.9 tpy.

Source Wide Conditions

The source wide conditions apply to all process equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment.

Individual HAP emissions are limited to 9.0 tpy and aggregate HAP emissions are limited to 22.5 tpy, both 12-month rolling. I observed the records on site and the facility had an aggregate HAP emission rate of approximately 200 lbs per year or 0.1 tons of the 22.5 ton limit. The aggregate emission rate is also below the individual limit set by the PTI.

Permit to install (PTI 171-17) – installation requirements

The facility's PTI 171-17 original permit application indicated that the facility intended to exempt emission units including a 287(2)(c) single flow coater and a 287(2)(c) single brush coater.

Discussion

Compliance Assistance: During the inspection I informed Mr. Goosen that the facility's permit would void if the equipment is not installed within the 18 months of the permit issuance. The facility should be aware that if they install the equipment after the 18 months it would not be covered by the opt out permit for HAPs.

Compliance statement: It appears that Rivershores Building Products is in compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules;

and PTI 171-17.

DATE 2/19/19

SUPERVISOR