NEOCOEGOZO

## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**ACTIVITY REPORT: Scheduled Inspection** 

FACILITY: Signature Cabinetry and Millwork		SRN / ID: N5962
LOCATION: 741 WAVERLY COURT, HOLLAND		DISTRICT: Kalamazoo
CITY: HOLLAND		COUNTY: ALLEGAN
CONTACT: Eric Vander Toorn , Owner		ACTIVITY DATE: 03/06/2020
STAFF: Cody Yazzie	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Inspect	on	
RESOLVED COMPLAINTS:		

On March 6, 2020 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 741 Waverly Court, Holland, Michigan at 2:00 PM to conduct an unannounced air quality inspection of what used to be GLW Finishing, LLC. Kalamazoo District Office (KDO) was aware that GLW Finishing had requested to void their PTI No. 328-96B due to the removal of the equipment and moving out of the property on May 16, 2018. KDO AQD Staff was also aware that new businesses may have commenced operations in this same location. Staff targeted this facility for inspection to see if any of the new manufacturing operations way need to require a permit to install to operate. Along with identifying if the source should had any operations that with emissions that would require the facility to report to the Michigan Air Emissions Reporting System (MAERS).

Upon arriving at the facility Staff noticed there were two signs on the property. One for Envision and the other for Signature Cabinetry and Millwork (SCM). Staff made initial contact with the office receptionist and provided her with a business card and stated the purpose of the visit. Staff was made initial contact with Tim Vander Toorn, Envision, Owner, and talked to him about the operations that were at the facility. Tim Vander Toorn informed staff that Envision was a custom job shop in which it creates custom metal parts and bases from prints provided by the customers. Typical industries that the facility is providing its services for are the automation and food/beverage companies. Staff asked for tour around the facility to see what type operations the business had. Envision had a number of metal working equipment and welding equipment that appeared to be exempt from permitting. The metal working equipment included tools used for cutting routing, drilling, and machining that emissions were released to the general in-plant environment. These all appear to be exempt with Rule 285(2)(I) (vi)(B). The welding operations appear to be exempt with Rule 285(2)(I).

During the facility tour Staff did notice a section of the facility that also included woodworking equipment. When Staff asked Tim Vander Toorn what the woodworking equipment was used for he explained that he leases out a portion of the facility to his brother Eric Vander Toorn. Further explaining that Eric Vander Toorn operates his own business SCM in which he makes cabinets and other wood furniture. Tim Vander Toorn allowed staff to observe what types of operations were being conducted in the SCM portion of the facility. Staff's observations will be further discussed below.

## Signature Cabinetry and Millwork (SCM):

During the walkthrough of SCM staff noticed that there was woodworking equipment such as saws and grinders that were internally routed to an indoor dust collector then vented to the in-plant general environment. These woodworking operations appear to be exempt from permitting with Rule 285(2)(I)(vi)(B). Staff also observed a coating booth in which appeared to be active. Staff received the contact information of Eric Vander Toorn from Tim Vander Toorn for further follow-up on the SCM operations.

Staff contacted Eric Vander Toorn about the coating operations and questioned if SCM had any coating usage records. Eric Vander Toorn explained that he is the only employee of SCM and does not use the coating booth that often. Eric Vander Toorn estimated that SCM uses roughly 70-90 gallons a year at most. He further explained that due to the size of his operations that he did not think that coating usage records needed to be kept. Staff explained that there are exemptions for smaller facilities that have coating lines, but most have these do have some sort of recordkeeping requirements. Staff further explained that AQD leaves it up to the facility to make the determination and provide proof that a permitting exemption can be meet, but the most commonly used exemption for a coating operation of SCM's expected size is Rule 287(2)(c).

Staff provided Eric Vander Toorn a website link in which has all permitting exemption Rules. Staff informed Eric Vander Toorn that the Rule 287(2)(c) are for coating lines that used less than 200 gallons a month minus water. As a part of this the facility must have a dry fabric filter or water wash control. Staff noted during the inspection that a fabric filter was installed and appeared to be in decent condition during the inspection. The facility also must maintain coating usage records. These can be actual usage records if the facility has the equipment or a system of measuring coating usage. Staff explained that KDO AQD have also accepted monthly purchase records and assumed that all purchased coatings were used during purchased month. This would mean that if a facility was going to use purchase records the largest amount of coating the facility could purchase in a month would be 200 gallons minus water.

Staff did explain that while the description of the coating operation provided by Eric Vander Toorn does sound like it could meet permitting exemption Rule 287(2)(c) the facility did not have the recordkeeping required by the rule to show that they are in compliance with the rule. Staff informed Eric Vander Toorn that a violation notice would likely be sent to the facility.

Staff updated the MACES facility information to reflect that Signature Cabinetry and Millwork is operating under the SRN N5962. The NAICS code was also changed to 337110 which is for wood kitchen cabinet and countertop manufacturing. This appears to be the best NAICS code to describe the operations at SCM.

## Furnaces:

During the inspection Staff asked if the facility had any boilers or furnaces for space heating. Tim Vander Toorn stated that the facility does have eight natural gas fired furnaces. Tim Vander Toorn informed staff that the furnaces range in a rated heat input capacity from 50,000 – 250,000 BTU/hour. These all appear to be exempt from permitting with Rule 282(2)(b).

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in non-compliance with Rule 201 of the State of Michigan's Air Quality Rules and Regulations. Staff stated to Eric Vander Toorn that a violation notice would be sent to the facility for the coating line that did not have adequate recordkeeping to show that it met a permitting exemption. Staff concluded the inspection at 2:45 PM.-CJY

NAME Cody Yenni

DATE 4/15/20

SUPERVISOR RIL 4/20