

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

N717250974

<b>FACILITY:</b> Craftwood Industries		<b>SRN / ID:</b> N7172
<b>LOCATION:</b> 2530 Kamar Drive, HOLLAND		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> HOLLAND		<b>COUNTY:</b> OTTAWA
<b>CONTACT:</b> Terry W. Beckering , President/CEO		<b>ACTIVITY DATE:</b> 10/14/2019
<b>STAFF:</b> Chris Robinson	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> FY'20 on-site inspection to determine compliance status with respect to the facility's General Permit to Install No. 187-02 for coating operations as well as other applicable air quality rules and regulations.		
<b>RESOLVED COMPLAINTS:</b>		

A scheduled unannounced inspection of Craftwood Industries (SRN N7172) was completed by AQD staff Scott Evans (SE) and Chris Robinson (CR) on October 14, 2019. The perimeter of the building located at 2530 Kamar Drive in Holland, Ottawa County Michigan was surveyed for odors and visible emissions. None were observed. AQD staff met with the facility's President/CEO, Terry Beckering. Intent of the visit was relayed along with identification.

Prior to entering the manufacturing area, CR reviewed the facility's Permit with Mr. Beckering who informed CR that the gentleman responsible for ensuring compliance with the permit, including recordkeeping and calculations, left the company approximately two (2) years ago. No one from the facility has dealt with the permit since. Mr. Beckering also indicated that there have been no changes to the coating line since it was installed and that the facility has switched to using more water-based coatings.

Craftwood Industries is a "Job Shop" specializing in office furniture components, primarily tops. These processes consist of various wood cutting equipment with portable dust collection systems, and adhesive and coating application/curing equipment. Except for the four (4) spray booths covered in the permit, all of the equipment is vented to the in-plant environment.

Wood cutting equipment is exempt from Rule 201 permitting requirements per Rule 285(2)(l)(vi)(B) for wood cutting equipment that vents to the in-plant environment. The facility uses a few types of adhesives for splicing veneer together to make larger sheets, for applying both the veneer and other laminates to wood substrates and for adhering trim boards for edging. The veneering operations uses less than one (1) gallon per month and the trimming operations uses approximately 10 gallons per month. Both of these operations appear to be exempt from permitting requirements per Rule 287(2)(a) for adhesive coating lines with an application rate of less than 2 gallons per month. The application of veneer tops consumes the most amount of adhesive. The facility purchases this type of adhesive as needed in a 275 gallon tote every other month, using approximately 137.5 gallons per month. This process appears exempt from permitting per Rule 287(2)(i). A hot melt adhesive is used for adhering veneer edge-banding. Hot melt systems are exempt from permitting requirements per Rule 287(2)(i).

Craftwood Industries maintains one (1) active General Permit to Install No. 187-02 for the coating line. The coating line consists of four (4) manual spray booths, three conventional ovens for initiating curing and one (1) flash oven for flashing VOC's associated with the application of the stains, and ultra-violate systems for curing. All purge/clean up solvents are being stored in a closed 55-gallon drum that is kept in a fire-proof cabinet. All spray guns are high volume-low pressure (HVLP). Dry filters were properly installed and appeared to be effective. Staff indicated that the filters are tested daily and replaced as needed. Safety Data Sheets are being maintained. Safety Data Sheets for the top three coatings used were requested, only to were received. Both are attached.

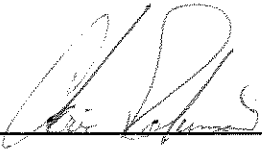
The permit allows, but does not require, the facility to use a thermal or catalytic oxidizer. Craftwood Industries uses neither, therefore special conditions IV.3-5, VI.2, VI.5-7 of FG-COATING are not applicable. Stack measurements were not explicitly measured but appeared to meet the specifications identified in the permit. Special Conditions VI.3 of FG-COATING requires the facility to keep monthly records which include:

- Purchase orders for all coatings, reducers, and purge/clean-up solvents.
- VOC content, in pounds per gallon, of each coating, reducer purge/clean-up solvent used.
- Gallons of each coating, reducer and purge/clean-up solvent used and reclaimed.
- VOC mass emission calculations determining the monthly emission rate for each coating line, in tons per calendar month, using the method specified in Appendix B of the permit.

- VOC mass emission calculations determining the annual emission rate for each coating line, in tons per 12-month rolling time period as determined at the end of each calendar month, using the method specified in Appendix B of the permit.

The facility was able to provide material usage records which, per discussions during the inspection, are based on purchase orders and invoices. This table is attached. Craftwood Industries uses different suppliers for their coating materials, one of which is Repcolite. Repcolite provides the facility with a monthly Environmental Compliance report which calculates emissions based on the amount of material purchased. An example is attached. Although these reports provide the records required by in FG-COATING SC VI.3.b and VI.3.d of the permit it does not nor does the facility track 12-month rolling emissions required by FG-COATING VI.3.e nor does it include records provided by other suppliers. At this time it is AQD's understanding that Repcolite materials are not the only materials used on the coating line and per FG-COATING SC VI.3 the facility is required to maintain records for all coatings used on this line. This line is subject to VOC emission limits of 2,000 lb/month and 10 tons per year (tpy). Flex Group FG-SOURCE of the permit limits the facility, source-wide, to 30tpy of VOCs. Due to the lack of records compliance with these emission limits could not be determined.

The facility is not maintaining records or preparing emission calculations as required which is a violation of SC VI.3.d, VI.3.e of FG-COATING and VI.1 of FG-SOURCE. A violation Notice will be issued. Also, prior to this inspection Craftwood Industries was last inspected by the AQD on November 28, 2007 in which the facility was issued a similar Violation Notice for not maintaining records. Therefore, the facility may be inspected on a more frequent basis.

NAME 

DATE 10/28/2019

SUPERVISOR 