

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

N734748408

FACILITY: Lakeland Mills, Inc.		SRN / ID: N7347
LOCATION: 1 LAKELAND PLACE, EDMORE		DISTRICT: Grand Rapids
CITY: EDMORE		COUNTY: MONTCALM
CONTACT: Keith Hunt, Maintenance Director		ACTIVITY DATE: 04/10/2019
STAFF: Adam Shaffer	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced scheduled inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the Lakeland Mills, Inc. (LM) facility located in Edmore, MI at 10:28 am on April 10, 2019 to complete an unannounced scheduled inspection.

Facility Description

Prior to entering the facility, off-site odor and visible emission observations were completed. The weather conditions at the time of the inspection were winds from the northeast at 10-15mph, high 30's °F and cloudy skies. A minor paint solvent odor was noted to the west of the site. No recent complaints have been received regarding LM. No visible emissions were observed.

Upon arrival AQD staff AS met with Mr. Keith Hunt, Maintenance Director, who provided a tour of the facility, answered site specific questions and provided requested records.

LM is a wood furniture manufacturer. Wood materials used are all softwoods such as cedar and pine. The facility is listed in operation with one Permit to Install (PTI) No. 189-04. At the time of the inspection, it was stated by LM staff that the dip tank trellis process was removed approximately 6-7 years prior. The equipment was verified during the inspection that it was removed, and PTI No. 189-04 shall be voided.

On-Site Observations

- Three paint booths were observed during the course of the site inspection. Minor air gaps were observed around the dry filters for the spray booths. The dry filters are changed about every three days. It was recommended to LM staff to close the air gaps in order to prevent particulate from escaping. Open containers were observed when the booths were not in use. AQD staff AS advised LM staff to keep containers covered when not in use in order to prevent fugitive emissions. Monthly usages were requested and provided. Based on the records provided, Booth #2 uses less than 100 gallons a month, though it was noted that recordkeeping had stopped being completed mid-January 2019. Based on the historical recordkeeping of usages, it is highly unlikely that Booth #2 exceeded a 200 gallon per month usage. It was concluded that Booth #2 appears to be exempt per Rule 287(2)(c). Moving forward, adequate recordkeeping demonstrating monthly usages for Booth #2 shall be kept in order to demonstrate continued compliance with Rule 287(2)(C). After requesting additional information and speaking with LM staff it was concluded that LM is unable to provide adequate records of monthly usages for Booth's #1 and #3 to demonstrate compliance with an applicable exemption, thereby requiring a

permit to install. This is a Rule 201 violation.

- A fourth spray booth was observed during the course of the site inspection. LM staff stated this spray booth is used by two companies that rent a portion of the site building (Wright Custom Furniture / Sleep Like a Log). Minor air gaps were observed around the dry filters in place that were also noted to be caked with coating materials. New filters were observed that staff stated they intended to replace with. Satisfactory operation of the paint booth such as replacing the dry filters on a timelier basis and limiting air gaps were discussed with company staff. Operation of the fourth paint booth had started in December 2018 and purchase orders were provided since then. All materials purchased are used. Based on the records provided the fourth spray booth appears to be exempt per Rule 287(2)(c).
- A drying area was observed where wood parts are dried. The room is heated with an 800,000 BTU/hr wood burner that utilizes untreated waste wood for fuel. The wood burner appears to be exempt per Rule 282(2)(b)(iii). The area can hold a maximum of 75,000 board feet of wood and is self-contained with the exception of the wood burner which vents externally. LM keeps the drying area between 110°F – 120°F. The drying area had been previously identified in the 2011 inspection to have a shorter drying time of usually 3-4 days and occasionally up to a week. The drying area was then concluded to not be in operation as similar to a kiln and having associated emissions. During the inspection and in phone conversations between AQD staff AS and LM staff following the site inspection, the following information was identified regarding the current use of the drying area.
 - For green wood received on site, the drying times are one to two weeks. LM also processes semi-dried wood that is typically placed in the drying area for four days. Cedar is the wood type typically dried in the drying area. A maximum of approximately 20% of wood materials processed in the drying area per month are non-cedar woods.

Based on the length of operation time, it was concluded that the drying area is in operation as a kiln. After speaking with LM staff, it was concluded that LM is not keeping track of board feet processed by the kiln. Using EPA Region 10 HAP and VOC Emission Factors for Lumber Drying, December 2012, and a worst case operating scenario of 80% being cedar and 20% being pine, monthly total emissions were less than 1,000 lbs per month. However, acetaldehyde exceeded the 20lbs per month limit, thus Rule 290 cannot be used. After further review, there appeared to be no applicable exemption for operation of the kiln, thereby requiring a permit to install. This is a Rule 201 violation.

- One parts washer was observed that utilizes mineral spirits, was labeled, was closed at the time and has an air vapor interface of less than 10 square feet. The parts washer appears to be exempt per Rule 281(2)(h).
- A self-contained area was used for a glassing operation for products. A safety data sheet was requested for the material used in the glassing operation. The safety data sheet identified no volatile organic compounds in the material used. After further review, the glassing operation appears to not have the potential for emissions; therefore, is not subject to air pollution control rules.
- Various wood working equipment was observed during the inspection such as saws, molders, shapers and a grinder. All emissions are vented to an approximately 42,000 cfm baghouse with associated storage silos located adjacent to the building. The ductwork for the baghouse allows air to be

recirculated back into the building during the winter months for heating and vented externally during the summer months. The baghouse has approximately 280-300 filters which are changed when emissions from the wood working operations are not being captured adequately. The wood working operations and associated baghouse appear to be exempt per Rule 285(2)(l)(vi)(C).

- Large amounts of saw dust waste was observed in the immediate area. After speaking with LM staff the primary cause of saw dust was from the loadout to trucks and feeding the wood burner. LM staff had also stated that the large amount of waste observed was from over the winter and that during the summer months the area is cleaned up when needed. After further review, the saw dust observed was not leaving the immediate area. In a follow up phone conversation with LM staff they had spread out the saw dust in order to dry and were in the process of cleaning the area.

Conclusion

Based on the records reviewed, conversations with LM staff and the facility walk through, LM appears to not be in compliance with applicable air pollution control rules at this time. A violation notice will be sent for the following violations.

- At the time of the inspection, LM was unable to provide adequate records to demonstrate that Booths #1 and #3 meet an applicable air pollution control exemption, thereby requiring a permit to install. This is a Rule 201 violation.
- At the time of the inspection, an applicable air pollution control exemption could not be identified for the one kiln in operation on site, thereby requiring a permit to install. This is a Rule 201 violation.

NAME

Adam J. Shaffer

DATE

05/07/19

SUPERVISOR

[Signature]

