

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

N749970718

FACILITY: MOD INTERIORS, INCORPORATED		SRN / ID: N7499
LOCATION: 9301 MARINE CITY HWY, IRA TWP		DISTRICT: Warren
CITY: IRA TWP		COUNTY: SAINT CLAIR
CONTACT: Justin Moon , Plant Manager		ACTIVITY DATE: 11/13/2023
STAFF: Noshin Khan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: scheduled, on-site inspection		
RESOLVED COMPLAINTS:		

On Monday, November 13, 2023, I, Noshin Khan, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, performed a scheduled, on-site inspection of Mod Interiors, Incorporated located at 9301 Marine City Highway, Ira Township, Michigan 49023 (SRN: N7499). The purpose of the inspection was to determine the facility's compliance status with the requirements of the federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended (Act 451); the AQD administrative rules, and the conditions of Permit to Install (PTI) Number 80-15.

I arrived at the facility at 10AM and met with Justin Moon, Plant Manager. The previous President of Mod Interiors, Donald Megie, retired and Justin has taken over Donald's role. I discussed the facility's permit and operations with Justin and explained the purpose of my visit. Mod Interiors does custom millwork, producing a variety of interior furniture for commercial customers. Justin said that the facility operates Monday through Friday from 6AM-4:30PM and has about 30 employees.

After discussing the facility's operations, Justin led me on a walkthrough of the facility. We began at the woodshop area, where I observed equipment including saws, an edge bander, and shapers. The particulates emitted from these units are controlled through 4 dust collection systems. I asked Justin how often the bags for these systems are replaced and he estimated that they're replaced every 3 months. A waste management company picks up full particulate drums for disposal.

One side of the shop is a preparation area where wood parts are sanded. The woodworking and sanding process are exempt from permit requirements per Michigan Air Pollution Control Rule 285(2)(l)(vi)(B) and 285(2)(l)(vi)(C). Justin also showed me a station where PVC glue is melted down from pellets and applied to veneer panels. The veneers are applied on wood pieces which are then put through a hot press. This process is associated with EUPVCGLUE in Permit 80-15.

The facility previously had a topcoat spray machine (EUBOOTH3) in the woodshop area. Justin informed me that this machine was removed around July 2023, and I observed that the machine was completely removed.

An open spray booth (EUBOOTH2) and an enclosed spray booth (EUBOOTH1) are located in a room adjacent to the woodshop area. In front of EUBOOTH2, I observed a staging area for wood pieces. In the booth, I noticed that the bottom right fabric filter in the booth was missing. This is a violation of FGWOOD Special Condition (S.C.) IV.1, which requires that the spray booths are only operated if exhaust filters are installed and maintained in a satisfactory manner. I informed Justin that all filters need to be in place to ensure proper capture of particulate emissions.

Inside EUBOOTH2, I also observed 55 gallon drums used to store waste coatings. These drums were covered with tight lids, in compliance with FGWOOD S.C. III.1.

A cold cleaner is located between EUBOOTH2 and EUBOOTH1. I observed that the cleaner was kept with its lid closed, has an air-vapor interface of less than 10 square feet, and has instructions for operation conspicuously posted as required by Michigan Air Pollution Control Rule 707(3). The cold cleaner is exempt from permit requirements per Rule 281(2)(h).

In EUBOOTH1, I observed that all filters were in place and in good condition. Justin said that the filters in both booths are replaced approximately weekly. He said that waste coatings and waste filters are

collected by Green Earth for disposal, which satisfies the proper disposal requirements in FGWOOD S.C. III.1 and III.2.

I observed HVLP applicators and pressure test caps in the spray booths, in compliance with FGWOOD S.C. IV.2.

Coatings are stored in shelving units next to the booths and I observed that all containers were closed when not in use, in accordance with FGWOOD S.C. III.3.

Justin walked me to the facility's second building, which he explained was a dry storage warehouse. I did not observe any coating or material processing operations here. During the walkthrough I did not observe any emergency generators or boilers.

At the end of the inspection, I discussed the facility's recordkeeping with Justin. I noted that the SDS's I previously received were for products that didn't match the names of the coatings I was told were used. During my previous inspection, staff informed me that "Wilson Art Contact Adhesive" and "Katilac Pre-Catalyzed Clear Lacquer" were the coatings used, but the SDS's provided for these were for products named "SelectPrime 1K Acrylic Lacquer Primer (Gray)" and "Clear ACR 50 sheen Self sealer." I requested SDS's for all materials used so that I could confirm if the wrong SDS's are being referenced for calculations. I also clarified that the permit requires usage and emissions calculations for all topcoats, adhesives, PVC glue, and clean-up solvents (FGWOOD S.C. VI.2-4, FGFACILITY S.C. VI.2-4); the current recordkeeping does not include calculations for all of these materials.

Brian Manasterski, in charge of finishing operations, sent me the requested SDS's after the inspection. The facility appears to be using values from the wrong SDS's for their emissions calculations. Additionally, not all required materials are included in the emissions calculations.

Per FGWOOD S.C. V.1, the facility is required determine the VOC content of coatings using federal Reference Test Method 24. During my inspection, Justin confirmed that the facility does not currently perform this testing and performs calculations using values from the SDS's. The facility does not have approval for using manufacturer formulation data in place of Method 24 and is not in compliance with this condition.

The facility is subject to the following emission limits in accordance with its permit:

FGWOOD

S.C. I.1: VOC and acetone combined limit of 9.5 tons per year (tpy), based on a 12-month rolling time period as determined at the end of each calendar month.

S.C. I.2: VOC and acetone combined limit of 2,000 lb/month.

S.C. I.3: Light hydrotreated distillate (CAS No. 68410-97-9) limit of 31.2 lb/day.

FGFACILITY

S.C. I.1: Individual HAP limit of less than 9.0 tpy based on a 12-month rolling time period as determined at the end of each calendar month.

S.C. I.2: Aggregate HAPs limit of less than 22.5 tpy based on a 12-month rolling time period as determined at the end of each calendar month.

S.C. I.3: Light hydrotreated distillate limit of 1,908.7 lb/year based on a 12-month rolling time period as determined at the end of each month.

The facility is also required to maintain the following usage and emissions calculations:

FGWOOD Special Condition (S.C.) VI.3.c:

VOC and acetone mass emission calculations determining the monthly emission rate in pounds and tons per calendar month.

FGWOOD S.C. VI.3.d:

VOC and acetone mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

FGFACILITY VI.3.d:

Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.

FGFACILITY VI.3.e:

Individual and aggregate HAP emission calculations determining the cumulative emission rate of each during the first 12-months and the annual emission rate of each thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month.

FGFACILITY VI.4.d:

Light hydrotreated distillate (CAS No. 68410-97-9) emission calculations determining the monthly emission rate in pounds per calendar month.

FGFACILITY VI.4.e:

Light hydrotreated distillate (CAS No. 68410-97-9) emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

In response to a violation issued during the previous inspection, the facility added calculations for monthly and 12-month rolling emissions of VOCs/acetone, HAPs, and light hydrotreated distillate as required by these recordkeeping conditions. However, because the incorrect composition is being used and because not all materials are currently accounted for in the emissions calculations, the current recordkeeping is not accurate and I'm unable to verify compliance with the emission limits listed in FGWOOD S.C. I and FGFACILITY S.C. I.

Mod Interiors, Incorporated is currently in violation of permit conditions FGWOOD S.C. VI.3, VI.4; and FGFACILITY S.C. VI.3, VI.4. in PTI 80-15. The facility's records do not include emission calculations for VOCs, acetone, light hydrotreated distillate, and individual and aggregate HAPs for all materials used. The VOC, acetone, light hydrotreated distillate, and HAP content of coatings has not been maintained in the facility's emissions calculations, making these calculations inaccurate. The facility is also in violation of FGWOOD S.C. V.1 because it does not determine the VOC content of coatings using federal Reference Test Method 24, as required. During the site walkthrough, I observed the bottom right fabric filter missing in EUBOOTH2, which constitutes a violation of FGWOOD S.C. IV.1. The facility will be receiving a violation notice for these issues.

NAME Noshin Khan

DATE 02/01/2024

SUPERVISOR K. Kelly