

N7827
 FY 2017 Insp-

DEPARTMENT OF ENVIRONMENTAL QUALITY
 AIR QUALITY DIVISION
 ACTIVITY REPORT: Self Initiated Inspection

N782741061

FACILITY: C A Hull, Inc.		SRN / ID: N7827
LOCATION: 8225 GOLDIE, WALLED LAKE		DISTRICT: Southeast Michigan
CITY: WALLED LAKE		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 07/25/2017
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY 2017 Inspection of C A Hull, Inc.		
RESOLVED COMPLAINTS:		

N7827 - SAR - 2017 07 25

C A Hull Co., Inc. (N7827)
Maverick Building Systems, Inc. (U-63-17- 05135)
Commerce Twp., Michigan 48390

Move (about March 2014): Maverick Building Systems, Inc. moved from 8225 Goldie St., City: Walled Lake, P.O.: Commerce Twp., Michigan 48390-4109 (N7827) to 3190 Walled Lake Court, Commerce Twp., Michigan 48390-1745 (U-63-17- 05135)

SRN N7827 reassign: Maverick Building Systems, Inc. → C A Hull, Inc. Maverick sold the building and yard as a result of 2010 construction industry great recession. Consequently, about March 2014, Maverick, moved out.

VNs: AQD issued Violation Notices dated May 7, 2008 (Rules 336-1201 & 336-1910) and June 21, 2007 (Rule 336-1910): Pursuant to Rule 336.1285(I), the Wood Cutting Process is exempt from Rule 336.1201 (Permit-to-Install) if the particulate emissions are controlled by an appropriately designed and operated air pollution control device (APCD) such as cyclone followed fabric filter collector (10 bags of size 6 feet tall & 2 feet diameter). If the APCD is not operated properly, the process is not exempt from Rule 201. Based upon AQD's observations, Maverick consistently operated the Wood Cutting Process while APCD was deliberately turned off in spite of being reminded repeatedly that a proper operation of an existing APCD was required by applicable state and federal clean air laws and regulations. Of ten bags, only five are moved to new location (3190 Walled Lake Court). All violations for Maverick occurred at 8225 Goldie St.

On June 27 (Maverick), and July 25 2017 (C A Hull, Inc.), I conducted a level 2 self-initiated **FY 2017 inspections** of Maverick Building Systems, Inc. ("Maverick") and C A Hull, Inc. located at two locations listed. The inspections were conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451 and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

C A Hull Co., Inc. (N7827)

During the inspection, Ms. Tiffany Ribble (Phone: NA; Cell: 810-217-9355; Fax: NA; E-mail: tRibble@caHull.com), Shop Forman, Mr. Josh Newsome (Phone: NA; Cell: 810-459-4380; Fax: NA; E-mail: jNewsome@caHull.com), Shop Forman, and Randy Boni (Cell: 313-790-0443), Wood Shop Forman, assisted me.

C A Hull, after Maverick moved out, operates at two street numbers: 8177 and 8225 Goldie St.

C A Hull is a construction company especially dealing in structural elements of bridges (MDOT projects). It stores in the yard H-columns (not I-beams) structural steel for bridges; previously, Maverick stored in the yard wood structural products and raw materials. All painting occurs at the bridges being built or repaired. While I-beams are used in horizontal structures and H-beams are used in vertical structures; obviously, there are different load conditions: shear forces for H-columns and bending and shear loads for I-beams.

Building 1 (Structural Steel)

In this building, small scale torch-cutting and welding of structural steel occurs. There is no ventilation hood. All emissions (mostly particulate) are discharged to in-plant environment. The machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(2)(i) (welding) and Rule 336.1285(2)(j) (portable torch-cutting).

Building 3 (Wood Shop)

In Building 3, one wood cutting saw is present. Saw dust emissions are captured and ducted to one large bag (4 ft. H * 1.5 diameter). I asked Mr. Boni to promptly empty the hopper for the bag. The wood shop builds concrete forms or molds.

Building 4 (Maintenance Shop)

Unlike Maverick, which used this building as a business and engineering offices, C A Hull uses this building as maintenance shop for trucks and equipment.

There is one Safety-Kleen Model 30 (3 ft. x4 ft.) parts cold-cleaner with spray a brush and a solvent tank. The cold-cleaner is subject rule 336.611 or 336.1707 (new) depending on if it is new or existing. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing (Rule 611) cold cleaners were placed into operation prior to July 1, 1979. New (Rule 707) cold cleaners are placed into operation on or after July 1, 1979.

Safety-Kleen Model 30 parts washer unit may be described as a "sink on a drum". The solvent is stored in the drum (enclosure reservoir) of about 30 gallons capacity. Parts are placed in the sink area and solvent is pumped over the part. The solvent then drains back into the drum. Mineral spirits, a low vapor pressure organic solvent, is used as a cleaner. All soiled parts cleaning is manual and soiled solvent drains into the reservoir by gravity.

Safety-Kleen supplies the solvents (replaced once in two months) and services the cold-cleaner. Mineral spirits containing no halogenated solvents is used. Once in two months, dirty solvent is picked up for disposal or recovery.

During the FY 2017 inspection, mechanically assisted lid was kept closed and the operating procedures were not posted (see below for decals).

The Cold-cleaner is NOT Subject to: 40 CFR, Part 63, Subpart T, NESHAP/ MACT T, since solvents containing halogenated compounds are not used.

On July 25, 2017, I gave DEQ's decals for "cold-cleaner operating procedures" for posting and complying with work-practice rules. I asked the company to follow the common sense work practice in the procedures.

Mineral Spirits NE (Stoddard solvent) or aliphatic hydrocarbons CAS 64742-47-8 (Safety-Kleen 800-669-5740)

100% VOC solvent. Flash Point (FP) = 105 °F TCC (Tag Closed Cup). Auto Ignition = 410 °F. Boiling Point (BP) = 310 °F @ 760 mm Hg. Vapor Pressure (VP) = 0.6 mm Hg at 68 °F = 1 mm Hg at 100 °F. Specific Gravity (SG, Water = 1.0) = 0.79. Density (ρ) @ 68 °F = 6.59 lbs / gallon (0.790 kg /L). Flammability range = 0.7 %v (LEL) – 5%v (UEL).

Maverick Building Systems, Inc. (U-63-17-05135)

During the inspection, Mr. Glenn Johnson (Phone: NA; Cell: 248-321-2921; Fax: 248-366-9413; E-mail: Glenn@MavBldgSys.com), President and Owner, assisted me.

Founded in 1996, Maverick is in the business of manufacturing building trusses. Maverick is a wholesaler of engineered wood products for primarily residential buildings.

Maverick operates computer controlled truss component saws (26 inches diameter).

The two (2) component saws (MiTek Smart Set Pro) cut wood (stud) to a desired size. The large wood chips fall near the saw by gravity. A vacuum system is located underneath the machine to capture saw dust and exhaust is ducted via common manifold. Saw dust is carried to an air pollution control device (APCD) consisting of one cyclone (located outside the building) and five (5: reduced from ten to five upon the move) bags arranged in series (all bags are located inside the building). The large particles are collected by the cyclone and saw dust is collected in one hopper. Saw dust fines are transported back into the building and filtered by five large bags (dimensions: 6 ft. H and 18 inches diameter). Filtered air is released to in-plant environment.

The component saws are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l) provided a combination of a cyclone and 5 bags are operated properly.

During FY 2017 inspection both one (1) cyclone and five (5) bags were operating properly; no visible emissions (VE). While the inside bags (5) are emptied once per month, the outside cyclone's hopper is emptied once per week. Unlike the previous location on Goldie Street, where APCD (one cyclone plus ten large bags in series) was not operated properly, saw dust was not spilled on soil outside.

AQD issued Violation Notices dated June 21, 2007, based upon May 21, 2007, inspection and May 07, 2008, based upon February 20, 2008, inspection for not operating the APCD. Mr. Bill Carlton stated that APCD was not effective.

The following are significant dates.

<u>Maverick Building Systems. (N7827)</u> <u>Roof Truss Mfg. Company</u>	
DATE	COMMENT
05/21/2007	AQD inspected Maverick and found that large scale wood-cutting machine, component saw (26 inches in diameter), was operating while the air pollution control device (APCD), consisting of one

<u>Maverick Building Systems. (N7827)</u> <u>Roof Truss Mfg. Company</u>	
DATE	COMMENT
	cyclone and 10-bag fabric filter, was not operating. I pointed out that this was violation of 336-1910 (Rule 910)
05/30/2007	AQD inspected and found again that Maverick operated wood-cutting machine while APCD was turned off.
06/21/2007	AQD issued a letter of violation (LOV) for violation of Rule 336-1910 (Rule 910)
10/10/2007	Mr. Glen Johnson stated that Maverick received June 21, 2007, LOV but he did not respond. I pointed out this case could be referred for an escalated enforcement action.
11/02/2007	AQD received an e-mail response, which stated that Maverick had begun using APCD on a diligent basis. It also stated that daily clean out of APCD was scheduled.
11/06/2007	AQD requested via e-mail a signed letter on business stationary with compliance schedule.
12/18/2007	As I arrived and inspected APCD was not operating when the wood-cutting machine was operating. Mr. Glen Johnson stated that the cyclone was iced up and could not operate it.
02/20/2008	Again, APCD was not operating when the wood-cutting machine was operating. Mr. Glen Johnson stated that he did not fix APCD yet. On February 20, 2008, Maverick's yard was snow covered. On this day, snow-covered soil had substantial wood saw dust fall-out. This indicated recent fall-out. Contrasting white background revealed it well. Mr. Johnson latter claimed he spread saw-dust around for better traction; this appeared to be not true.
04/24/2008	Mr. Bill Carlton, saw operator, stated that APCD was not effective. Therefore, Maverick did not operate APCD.
05/07/2008	AQD issued second letter of violation (LOV) for violation of Rules 336-1910 (Rule 910) and 336-1201 (Rule 201).
06/13/2008	Mr. Bill Carlton stated that APCD produces lot of noise. Mr. Glen Johnson stated that he was talking to a vendor to design the capture system.
07/02/2008	AQD received a response letter dated June 27, 2008, for May 21, 2008, LOV
09/24/2008	Mr. Glen Johnson stated that he did not find a reliable capture system. He also stated that he neither had time nor money for it. Furthermore, he could not fix APCD for couple of years due to lack of funds.
10/20/2008	AQD staff and Mr. Glen Johnson met in MDEQ's Warren Office.

About March 2014, Maverick moved to a new location near Walnut Lake Road and Haggerty (about 1.5 miles away).

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Conclusion

Maverick has history of Rule 910 violations by not operating a cyclone and baghouse (in series) when the wood cutting process is operating. Maverick is in compliance by operating

cyclone and bags properly at new location. In addition, C. A Hull is in compliance with cold-cleaner rules except posting of operating procedures (DEQ Decal)

FYI: VN

June 21, 2007

CERTIFIED MAIL

Mr. Glen Johnson
Maverick Building Systems
8225 Goldie
Walled Lake, Michigan 48390

SRN: N7827, Oakland County

Dear Mr. Johnson:

LETTER OF VIOLATION

On May 21 and May 30, 2007, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), conducted an inspection of your facility located at 8225 Goldie Street, Walled Lake, Michigan. The purpose of this inspection was to determine your 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); MDEQ-AQD's administrative rules.

During the inspection, the following air pollution violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Wood Cutting Process for Building Truss Manufacturing	Rule 336-1910 (Rule 910)	The air pollution control device was not operating when the wood cutting process was operating.
<p>⁸ Pursuant to Rule 336.1285(l), the Wood Cutting Process is exempt from Rule 336.1201 (Permit-to-Install) if the particulate emissions are controlled by an appropriately designed and operated air pollution control device (APCD) such as cyclone followed fabric filter collector (10 bags of size 6 feet tall & 2 feet diameter). If the APCD is not operated properly, the process is not exempt from Rule 201.</p>		

On May 21 and 30, the AQD staff observed operation of the wood cutting process while the air pollution control device (APCD) consisting of one cyclone and 10-bag fabric filter was turned off because of APCD noise. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please be advised that sawdust emissions must be captured by appropriately designed capture system in order to deliver air contaminants to the air pollution control device (APCD) consisting of one cyclone and 10-bag fabric filter. Sawdust on the plant floor is a sign that the capture system is not working properly. Besides, the collected air contaminants in APCD must be handled properly such that the contaminants are not spilled on ground or released to ambient air.

You should immediately initiate necessary actions to correct the cited violations. **Additionally, please submit a report of your program for compliance with the above cited rules by July 12, 2007.** At a minimum, this report should explain the causes and duration of the violations, whether the violations are ongoing, remedial action taken, and what steps are being taken to prevent a

reoccurrence. If the violations are not resolved by the date of your response, describe what equipment you will install, procedures you will implement, processes or process equipment you will shut down, or other actions you will take and by what dates these actions will take place.

Pursuant to MCL 324.5531(1), if a person knowingly fails to comply with an air pollution control rule, he is guilty of a misdemeanor. Please note that this letter of violation satisfies "knowing" component of the law (MCL 324.5531(1), PA 451) in connection with continued operation of the wood cutting process without proper capture and control of sawdust emissions. In other words, if the process is operated with the air pollution control device (a cyclone followed by a 10-bag fabric filter) disabled, or turned off, it will be deemed knowing violation of PA 451.

Notwithstanding your response to the preceding citations, the AQD may initiate further enforcement action to address violations of state and federal Clean Air Acts, rules and regulations.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of your facility. If you have any questions regarding the violations or the actions necessary to bring your facility into compliance, please call me at the number listed below.

Sincerely,

Iranna S. Konanahalli

Air Quality Division
586-753-3741

ISK:VLL

cc: Mr. Gerald Avery, DEQ
Mr. Thomas Hess, DEQ
Ms. Teresa Seidel, DEQ
Ms. Tina Straw, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Richard Taszreak, DEQ

May 7, 2008

CERTIFIED MAIL

Mr. Glen Johnson
Maverick Building Systems
8225 Goldie St.
Walled Lake, Michigan 48390

SRN: N7827, Oakland County

Dear Mr. Johnson:

LETTER OF VIOLATION

On May 21 & 30, October 10 & 30, December 18, 2007, and February 20, April 24, 2008, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), conducted an inspection of Maverick Building Systems ("Maverick") located at 8225 Goldie Street, Walled Lake, Michigan. The purpose of these inspections was to determine your 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); MDEQ-AQD's administrative rules.

During the inspection, the following air pollution violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Wood Cutting Process for Building Truss Manufacturing	Rule 336-1201 (Rule 201) Permit-to-Install	Maverick Building Systems ("Maverick") installed this process without first obtaining a Permit-to-Install. ⁹
Wood Cutting Process for Building Truss Manufacturing	Rule 336-1910 (Rule 910)	The air pollution control device was not operating when the wood cutting process was operating.
⁹ Pursuant to Rule 336.1285(l), the Wood Cutting Process is exempt from Rule 336.1201 (Permit-to-Install) if the particulate emissions are controlled by an appropriately designed and operated air pollution control device (APCD) such as cyclone followed fabric filter collector (10 bags of size 6 feet tall & 2 feet diameter). If the APCD is not operated properly, the process is not exempt from Rule 201. Based upon AQD's observations, Maverick consistently operated the Wood Cutting Process while APCD was deliberately turned off in spite of being reminded repeatedly that a proper operation of an existing APCD was required by applicable state and federal clean air laws and regulations.		

During most of the inspections, it was noted that you had installed and commenced operation of an unpermitted Wood Cutting Process at your facility. The AQD staff advised you this was a violation of Act 451, Rule 201, which states in part;

"A person shall not install, construct, reconstruct, relocate, alter, or modify any process or process equipment, including control equipment pertaining thereto, which may emit an air contaminant, unless a Permit to Install which authorizes such action is issued by the department."

Be advised that Rule 201 requires that an air use permit be obtained prior to installation, construction, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Be advised that the AQD may initiate appropriate enforcement action for your unpermitted installation and operation of this process equipment. Furthermore, continued operation of unpermitted equipment is not authorized.

On May 21 & 30, October 10 & 30, December 18, 2007, and February 20, April 24, 2008, the AQD staff observed operation of the wood cutting process while the air pollution control device (APCD) consisting of one cyclone and 10-bag fabric filter was turned off because of APCD noise. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law. Upon AQD's request, the APCD was turned on. AQD confirmed that APCD was in good working condition although the capture system needs some improvement.

In addition, a letter of violation (LOV) was issued to Maverick on June 21, 2007, for violation of Rule 910. This LOV was issued as a result of observations made during the inspections of May 21 and 30, 2007. In spite of AQD's frequent emphasis of Maverick's (Mr. Glen Johnson's) obligation to respond to the LOV in writing, the AQD has never received a written response.

On February 20, 2008, Maverick's yard was snow covered. On this day, snow-covered soil had substantial wood saw dust fall-out. This indicated recent fall-out. Contrasting white background revealed it well.

Please be advised that sawdust emissions must be captured by an appropriately designed capture system in order to deliver air contaminants to the air pollution control device (APCD) consisting of one cyclone and 10-bag fabric filter. Sawdust on the plant floor is a sign that the capture system is not working properly. Besides, the collected air contaminants in APCD must be handled properly such that the contaminants are not spilled on ground or released to ambient air.

You should immediately initiate necessary actions to correct the cited violations. **Additionally, please submit a report of your program for compliance with the above cited rules by May 28, 2008.** At a minimum, this report should explain the causes and duration of the violations, whether the violations are ongoing, remedial action taken, and what steps are being taken to prevent a reoccurrence. If the violations are not resolved by the date of your response, describe what equipment you will install, procedures you will implement, processes or process equipment you will shut down, or other actions you will take and by what dates these actions will take place.

Pursuant to MCL 324.5531(1), if a person knowingly fails to comply with an air pollution control rule, he is guilty of a misdemeanor. Please note that this letter of violation satisfies "knowing" component of the law (MCL 324.5531(1), PA 451) in connection with continued operation of the wood cutting process without proper capture and control of sawdust emissions. In other words, if the process is operated with the air pollution control device (a cyclone followed by a 10-bag fabric filter) disabled, or turned off, it will be deemed knowing violation of PA 451.

Notwithstanding your response to the preceding citations, the AQD may initiate further enforcement action to address violations of state and federal Clean Air Acts, rules and regulations.

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NAME Iranna S. Konanahalli

DATE 07/27/2017 SUPERVISOR Joyce Z