

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

N799933782

FACILITY: SHELBY CABINETS		SRN / ID: N7999
LOCATION: 4651 25 MILE RD, SHELBY TWP		DISTRICT: Southeast Michigan
CITY: SHELBY TWP		COUNTY: MACOMB
CONTACT: Tom Urbin , Co-owner		ACTIVITY DATE: 02/22/2016
STAFF: Samuel Liveson	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection of opt-out facility.		
RESOLVED COMPLAINTS:		

On February 22, 2016, I conducted a scheduled, level 2 inspection of Shelby Cabinets, located at 4701 25 Mile Road in Shelby Township, Michigan. The purpose of this inspection was to determine the facility's compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), and the conditions of Permit to Install (PTI) No. 115-08.

I arrived on site around 2:20 PM. I met with Mr. Tom Urbin, Co-Owner, and with Ms. Ann Orzel, Secretary. Mr. Urbin provided a site walkthrough and Ms. Orzel provided facility records. I provided Mr. Urbin and Ms. Orzel with my contact information and a copy of the pamphlet "DEQ Environmental Inspections: Rights and Responsibilities."

I had originally visited the facility to inspect on Thursday, February 18 around 9:30 AM. Mr. Urbin asked that I return when he is available because Mr. Urbin was leaving the facility for the day and Ms. Orzel was absent.

Opening Meeting

Shelby Cabinets paints and constructs residential cabinetry. The company operates 8 hours for 5 days a week. PTI No. 115-08 permits a manual spray booth at the facility and acts as a HAP opt-out permit.

Facility Walk-Through

Shelby Cabinets consists of two buildings. The west building contains sanding and woodcutting equipment, as well as the manual spray booth for coating wood parts. The east building contains the finishing and assembly area.

Sanding and Woodcutting Equipment

The facility has several saws and sanders used for wooden cabinet construction. Emissions from these operations are controlled by a cyclone and baghouse before being vented back inside the building. Bulk saw dust from the cyclone is collected in a container. Finer saw dust from the baghouse is collected in a separate container. Bags in the baghouse are shaken out approximately once a day and are replaced as needed. Mr. Urbin explained that if the baghouse was not operating properly, it would affect the facility air quality. This equipment appears to be exempt from obtaining a Permit to Install per R 285(l)(vi)(B).

Manual Spray Booth – EU-WOODCOAT

The facility has one spray booth with several manual HVLP applicators per PTI No. 115-08 Special Condition (S.C.) 1.7. The spray booth applies stain and clear coating. The facility had square paper mesh filters in place along the wall of the booth. These filters appeared to be

new. Extra filters are available on site. According to Mr. Urbin, these filters are replaced as needed, approximately once a week. This appears to be satisfactory per S.C. 1.6.

The paint kitchen contains coatings used in the spray applicators. I pointed out to Mr. Urbin that two coating containers approximately 5 gallons in size of clear coating had lids open. He explained that these containers were currently in use so that operator access was necessary per S.C. 1.5. He explained that containers are closed when not in use. All other containers were closed.

Waste coatings are placed into a closed 55-gallon container that is disposed of by a hazardous waste company per S.C. 1.3. Mr. Urbin provided a Manifest of Disposal showing proper disposal of waste materials.

Finishing and Assembly Area

The finishing and assembly area includes a small saw that emits indoors per R 285(l)(vi)(B).

According to Mr. Urbin and from my observations during the facility walkthrough, there do not appear to be cold cleaners, boilers, or emergency generators on site.

Stack – SV-WOODCOAT

The facility stack associated with the spray booth appears to meet the dimensions described and is unobstructed per S.C. 1.12. No opacity was observed.

Recordkeeping

Ms. Orzel provided a spreadsheet of daily recordkeeping and monthly emissions from January of 2014 through February of 2016 per S.C. 1.9, and 1.11. From this data, 12-month rolling data can be determined for December of 2014 through February of 2016. She showed me the coating datasheets kept on file per S.C. 1.10 and S.C. 2.2. Facility staff keep a paper record of how much coating they use on a daily basis. Ms. Orzel provided a sample of this paper record for January of 2016. This paper record is input into the electronic spreadsheet.

The highest 12-month rolling VOC emissions were 2.4 tons in September of 2015. This is below the facility limit of 30 tons VOC per 12-month rolling time period per S.C. 1.1.

The same spreadsheet includes HAP recordkeeping per S.C. 2.4. The highest 12-month rolling aggregate HAP emissions were 1.8 tons in January of 2016. This is below the facility limit of 22.5 tons HAP per 12-month rolling time period. This also shows that the facility did not exceed its individual HAP limit of 9 tons HAP per 12-month rolling time period.

The facility is limited to a VOC content of 6.10 lb/gal minus water as applied per S.C. 1.2. In facility records, of 20 coatings used, two materials appear to have higher VOC contents:

- WOODSONG II Stain Base and Pre-Stain – 8.8 lbs VOC/gal minus water
- Standard Lacquer Thinner – 7.09 lbs VOC/gal minus water

On March 11, Ms. Orzel provided the material safety datasheet for WOODSONG II. On March 15, Regulatory Information Services of the Sherwin-Williams Company provided the environmental datasheet (EDS) for WOODSONG II. Both datasheets show that the correct VOC content of this material is 6.07 lbs VOC/gal less exempt solvents. On March 16, I called Ms. Orzel to ask her to correct facility records. WOODSONG II appears to be in compliance with the limit of 6.10 lb/gal minus water.

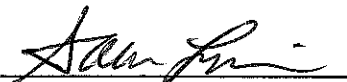
The material safety datasheet for Standard Lacquer Thinner verifies the VOC content of 7.09 lbs VOC/gal less exempt solvents. Standard Lacquer Thinner is used as a thinner rather than a coating. Thinner is mixed into other coatings, and not used by itself "as applied". According to Ms. Orzel, Standard Lacquer Thinner is used with coatings C14814, C14812, WS2B10, WS2122, W358211, W358222, WS9714, W3709, WS2M301, and WS2M302 in ratios of 10-25%. With coatings WS2B10 and WS2122, the ratio is 2-5%. Considering these weighted ratios, the facility does not appear to exceed the limit of 6.10 lb/gal minus water as applied per S.C. 1.2.

According to a representative of The Sherwin-Williams Company, values on its MSDS and Environmental Data Sheets are theoretical. Because the facility has low VOC emissions not near its emission limit, MDEQ-AQD approves the use of formulation data to determine VOC content until further notice per S.C. 1.8.

Compliance

Based on the AQD inspection and records review, it appears that Shelby Cabinets is in compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the conditions of PTI No. 115-08.

NAME



DATE

3/17/16

SUPERVISOR

CJE