



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

October 3, 2022

VIA E-MAIL AND U.S. MAIL

Tom Urbin
Shelby Cabinets
4651 25 Mile Road
Shelby Township, MI 48316

SRN: N7999, Macomb County

Dear Tom Urbin:

VIOLATION NOTICE

On July 15, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Shelby Cabinets located at 4651 25 Mile Road, Shelby Township, Michigan 48316. The purpose of this inspection was to determine Shelby Cabinets' 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); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 115-08.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Wood coating	EU-WOODCOAT SC 1.2	Application of coating WS2VB6 exceeds the permitted material limit of 6.10 lb/gallon VOC less exempt solvents. Environmental Data Sheets (EDSs) provided by the facility show that WS2VB6 has a VOC content of 7.07 lb/gallon less exempt solvents.
Wood cabinet assembly	R 336.1201 (Rule 201)	The facility uses hot melt adhesive for cabinet assembly. The facility performs this operation without a permit.

During this inspection, it was observed that the facility uses hot melt adhesive as part of the wood cabinet assembly process. The facility has not obtained a PTI for this process and is in violation of Rule 201. A program for compliance may include a PTI application, which is available by request or online at michigan.gov/air.

Alternatively, the process may be exempt under Michigan Air Pollution Control Rule **R336.1287(2)(a)**, which states, in part:

R336.1287 Permit to install exemptions; surface coating equipment.

Rule 287. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

- (a) An adhesive coating line which has an application rate of less than 2 gallons per day and which has emissions that are released only into the general in-plant environment.

If Shelby Cabinets decides to operate pursuant to this exemption Rule (R336.1287(2)(a)), then the company must ensure that emissions from adhesive application are released only into the general in-plant environment and should maintain records indicating an application rate of less than 2 gallons of adhesive per day.

As part of the records review process, the facility shared EDSs for the coatings applied to its products. Coating WS2VB6 (WOODSONG II AMAZING Stain Base) has a VOC content of 7.07 lb/gallon less exempt solvents according to the provided EDS. The facility noted that this coating is combined with a lacquer thinner to yield a coating mix with up to 50% thinner. This thinner, C18936, has a VOC content of 6.73 lb/gallon less exempt solvents according to the provided EDS. Applied on its own or as a 50/50 mix with C18936, coating WS2VB6, as applied, exceeds a VOC content of 6.10 lb/gallon less exempt solvents. This is a violation of PTI 115-08, EU-WOODCOAT Special Condition 1.2.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 24, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Tom Urbin
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Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Shelby Cabinets believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

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

Sincerely,



Noshin Khan
Environmental Engineer
Air Quality Division
586-536-1997

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE