

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

N820435206

FACILITY: BOLD COMPANIES		SRN / ID: N8204
LOCATION: 2291 OLTHOFF DR, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: Ron Maynard , Human Resources & Continuous Improvement Manager		ACTIVITY DATE: 06/17/2016
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: The purpose of this inspection was to follow-up on the MAERS non-submittal and to determine compliance with PTI No. 380-08 and all other applicable Air Quality Rules and Regulations.		
RESOLVED COMPLAINTS:		

On Friday June 17, 2016 AQD Staff Kaitlyn DeVries (KD) conducted an unannounced, self-initiated inspection of Bold Companies (Bold), also known as Bold Furniture, located at 2291 Olthoff Drive, Muskegon, Michigan. The purpose of this inspection was to follow up on the MAERS non-submittal and to determine compliance with Permit to Install No. 380-08 and all other applicable Air Quality Rules and Regulations.

KD arrived at the facility at approximately 9:00 am and observed the area for any excess odors or opacity. None were observed. KD met with Mr. Ron Maynard, Human Resources & Continuous Improvement Manager, who accompanied KD on the tour of the facility. Prior to the tour, KD presented Mr. Maynard with the Environmental Rights and Responsibilities pamphlet, which was briefly discussed. KD also discussed the MAERS requirements, and asked about the non-submittal. Mr. Maynard told KD that he knew of the requirements, and was new to the role. KD reiterated that AQD has sent them multiple letters, e-mails, and phone calls regarding this with no response. KD left the facility at approximately 10:15 am.

The required MAERS report was received on June 27, 2016, and will be fully reviewed when the records are made available.

Facility Description

Bold is a manufacturer of wood furniture, primarily office furniture. The majority of the facilities operations are woodworking operations such as cutting, sanding, sawing, and drilling. KD noted on her way to the facility, a secondary facility located at approximately 2086 E. Sherman Ave, Muskegon, Michigan. KD asked Mr. Maynard about this facility, and he stated Bold began operations in that facility in 2014.

A stationary source determination was done on this facility, and it was determined that they are indeed one stationary source. Plant 1 houses a majority of the operations, including the permitted equipment, and primarily does veneer finishing. Plant 1 also serves as the primary warehouse. Plant 2, located at 2086 E. Sherman Ave, contains the rest of the equipment and primarily does laminate finishing, which doesn't require any curing.

Regulatory Analysis

Bold currently holds one (1) permit, a Hazardous Air Pollutant (HAP) Opt-Out Permit, PTI No. 380-08. This permit did undergo New Source Review (NSR) at the time of issuance, even though it was not explicitly apparent. Additionally, since Bold accepted Opt-Out Limits, they are not subject to 40 CFR Part 63 Subpart JJ for Wood Furniture Manufacturing Operations; thus, they are not subject to any federal regulations at this time. Bold also utilizes several Rule 201 permitting exemptions, which are detailed in the Compliance Evaluation section below.

Compliance Evaluation

Exempt Emission Units

Both plants have several cutting, drilling, sawing, and sanding stations. The sawing and sanding stations are vented to one of several baghouses located throughout each plant. The baghouses are then exhausted internally. These processes are exempt from Rule 201 permitting under Rule 285 (l)(vi).

Bold uses a hot melt adhesive for application of edging on some of the products, and is not placed into the cure oven. This is exempt from Rule 201 permitting under Rule 287 (i).

A laminating line is located in Plant 2 (Sherman Ave). Contact cement is used in this process to adhere the laminate top. This process is exempt from Rule 201 permitting under Rule 287 (c), however, Bold was unable produce the records in a timely manner. A Violation Notice (VN) will be issued for Rule 201, failure to obtain a permit, since records for the exemption were unavailable.

Additionally, Bold does not have any boilers, emergency generators, or cold-cleaners in either plant.

FGFACILITY

This flexible group is comprised of all process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

There are three (3) coating booths (EUBOOTH1, EUBOOTH2, and EUBOOTH3) all housed in one common finishing room each with individual exhaust systems. The stacks were not explicitly measured, but appeared to be of proper dimensions. All three (3) booths were outfitted with adequate dry filters, and per Mr. Maynard they are changed on an as needed basis, but are usually changed daily. PTI No. 380-08 indicates that EUBOOTH1 is followed by a UV light panel for curing; however, Mr. Maynard indicated that currently, they are not using this piece of equipment at all. Bold is using an oven for curing the finishes. The natural gas cure oven is operated at 110°F for approximately 15 minutes. This cure oven is exempt from Rule 201 permitting under Rule 282 (a).

The sandroom (EUSANDROOM), has three (3) sanding stations; none of the stations were in operation during the time of the inspection. The area itself is self-contained, and not externally vented. Mr. Maynard explained that they are actively working on improving the ventilation in this area, to change from the backpack style exhaust system to something better. KD recommended that if any major changes are made to the ventilation system in this area and emissions may be exhausted to the ambient air, Bold should contact AQD prior to doing so, as this may require re-permitting.

Bold has several natural gas air make-up units for the building(s) (EUSPACEHEATING), all of which appeared to be properly operating. Additionally, all containers appeared to be covered at the time of the inspection.

Bold requested in January 2009, and AQD approved, the use of manufacturer's formulation data in lieu of method 24 to determine the VOC content and Method 311 for HAP content of the materials used. However, AQD requested the formulation data, and Bold was not able to provide the data in a timely manner. A VN will be sent for PTI No. 380-08 FGFACILITY Special Condition V. 1 and 2.

HAP's are individually limited to 5.0 tons per year (tpy) 12-month rolling and aggregately to 12.5 tpy, 12-month rolling. VOC's are also limited to 24.0 tpy 12-month rolling. KD requested the records from Mr. Maynard in person and again via e-mail. Since Bold was unable to produce the required records outlined in PTI No. 380-08 Special Condition VI 2 & 3 for HAP and VOC records KD is unable to determine compliance with the emission limits; this will be included in the VN. Once the records are received, they will be evaluated for compliance with the emission limits.

Compliance Determination

Based on the observations made during the time of the inspection it appears as if Bold Companies is not in compliance with PTI No. 380-08. A VN will be sent for the following items:

1. FGFACILITY Special Condition V. 1&2 - Failure to maintain required manufacturers formulation data
2. FGFACILITY Special Condition VI. 2. a-e - Failure to maintain Hazardous Air Pollutant Records
3. FGFACILITY Special Condition VI. 2. a-e - Failure to maintain Volatile Organic Compounds Records
4. Laminating Line Rule 201 - Failure to maintain records for Rule 287(c) exemption

NAME Karlyn D. [Signature] DATE 6/29/2016 SUPERVISOR [Signature]