

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

N820466542

FACILITY: BOLD FURNITURE COMPANY		SRN / ID: N8204
LOCATION: 2291 OLTHOFF DR, MUSKEGON		DISTRICT: Grand Rapids
CITY: MUSKEGON		COUNTY: MUSKEGON
CONTACT: Tommy Buffum ,		ACTIVITY DATE: 02/14/2023
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On site inspection to assess compliance with AQD rules and regulations.		
RESOLVED COMPLAINTS:		

### Introduction

On February 14, 2023, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division (AQD) staff member Scott Evans (SE) conducted an unannounced, on-site inspection of the Bold Co. facility located at 2291 Olthoff Dr. in Muskegon, Michigan, to assess compliance with the requirements of Permit to Install (PTI) No. 380-08 and all other applicable air quality rules and regulations. Bold Co. is a furniture manufacturing facility that cuts, shapes, and assembles wood into customizable products such as chairs and desks. This facility is classified as a Title V Opt-Out facility. Due to the acceptance of Opt-Out limits for Hazardous Air Pollutants (HAPs), the facility is not subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart JJ for wood furniture manufacturing at this time.

Upon arrival at the facility, SE conducted an initial inspection of the facility exterior. During this initial inspection there were no observed odors or visible emissions. SE then entered the facility and was greeted by Tommy Buffum. A brief discussion was held to explain the purpose of the visit and then a site inspection was conducted. During the inspection sanding areas, coating application areas, wood carving areas, and laminate installation areas were all visited and assessed for compliance. The roof was not accessed for safety reasons, however all stacks were observable from the ground as discussed later in this report.

### PTI No. 380-08

This PTI was approved on December 23, 2008. It includes five emission units (EUs) and one flexible group (FG) as listed below.

- EUBOOTH1
- EUBOOTH2
- EUBOOTH3
- EUSANDROOM
- EUSPACEHEATING
- FGFACILITY

### FGFACILITY

This FG includes all process equipment source-wide including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

This FG has three emission limits as shown in the table below:

Pollutant	Limit	Time Period	Highest Recorded	Compliance
Individual HAPs	<5.0 tpy	12-month rolling annual	1.04 tpy of Toluene	In Compliance
Aggregate HAPs	<12.5 tpy	12-month rolling annual	2.121 tpy	In Compliance
VOCs	24 tpy	12-month rolling annual	4.543 tpy	In Compliance

The above table demonstrates compliance with the emission limits. This compliance was determined through review of records that were provided by the facility and are discussed in more detail further below.

This FG has three operational restrictions. First, the facility is required to handle all VOC and HAP containing material in a manner that minimizes generation of fugitive emissions, such as keeping material containers covered when not in use. During the inspection material containers and waste containers were observed to be appropriately covered and stored to maintain compliance with this requirement. Second, the facility cannot operate EUBOOTH1, EUBOOTH2, or EUBOOTH3 equipment unless exhaust filters are properly installed, maintained, and operated. During the inspection it was discussed and observed that filtering systems for all emission units were installed and in good condition. Maintenance was discussed and it was explained that filter replacements happen as needed and often occur multiple times weekly. This fact and the visual appearance of all active filters being in good condition with no gaps demonstrate proper compliance. Third, the facility may not operate EUSANDROOM equipment unless particulate matter (PM) capture devices are properly installed, maintained, and operational. During the inspection multiple internally vented baghouses were installed and operational, and maintenance procedures such as emptying of dust collection bags were discussed and appear to be adequate, demonstrating compliance. These baghouses?

This FG has two testing requirements. Together, these requirements stipulate that the facility must determine the HAP and VOC content of any materials used. The facility is allowed to use manufacturer formulation data of these materials with approval from the AQD. The facility has previously requested and acquired approval from the AQD to use manufacturer formulation data for emission calculations. During the inspection the facility was able to provide manufacturer formulation data sheets to demonstrate compliance with these requirements.

This FG has the following recordkeeping requirements:

- Monthly HAP Records Requirements:
  - Amount of HAP containing material used.
  - Amount of HAP containing material reclaimed, if any.
  - Monthly individual and aggregate HAP emissions.
  - 12-month rolling annual individual and aggregate HAP emissions.
- Monthly VOC Records Requirements:
  - Amount of VOC containing material used.
  - Amount of VOC containing material reclaimed, if any.
  - VOC content of all VOC containing materials.
  - Monthly VOC emissions.

- 12-month rolling annual VOC emissions.

During the inspection, it was observed that appropriate records are maintained by the facility. Records for the period of January 2022 through December 2022 were provided to the AQD remotely for a detailed review. During this review it was observed that appropriate records are being maintained. These records were used to make the compliance determinations discussed in the emission limit table above.

This FG has three stack restrictions. Though stacks were not directly measured during the inspection for safety reasons, a visual inspection confirmed that all three stacks were present and appeared to comply with permitted height and diameter restrictions.

#### Other Items

During the inspection, several process stations such as wood cutting, drilling, and sanding were observed on site. These stations all were seen to be venting through various baghouses throughout the plant, which are all vented internally through multiple baghouses used to control air quality for employee comfort. This equipment is exempt from permitting requirements under Rule 285(2)(I)(vi) (B).

This facility utilizes hot melt application for the edging of some products. This process does not utilize any cure oven and is exempt from air permitting requirements under Rule 287(2)(i).

#### Conclusion

At the conclusion of the inspection the facility appeared to be compliant with the requirements of PTI No. 380-08 and all other applicable rules and regulations.

NAME Scott Evans

DATE 3/7/2023

SUPERVISOR 