

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

P047760188

FACILITY: G-M WOOD PRODUCTS		SRN / ID: P0477
LOCATION: 531 CLAY STREET, NEWAYGO		DISTRICT: Grand Rapids
CITY: NEWAYGO		COUNTY: NEWAYGO
CONTACT: Tyler Huntley , Plant Manager		ACTIVITY DATE: 09/09/2021
STAFF: Michael Cox	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled Unannounced Inspection		
RESOLVED COMPLAINTS:		

On Thursday, September 9, 2021, AQD Staff Michael Cox (MTC) conducted an unannounced scheduled inspection of G-M Wood Products located at 531 Clay Street, Newaygo, MI 49337. The purpose of this inspection was to verify compliance with applicable air quality rules and regulations. MTC arrived on site at approximately 10:00 am and contacted Mr. Tyler Huntley, Plant Manager, to conduct the inspection. Prior to the inspection, MTC drove by the area. No visible emissions or odors were noted. Prior to the facility walkthrough, there was some discussion of which exemptions are being utilized by the facility. The facility currently operates all processes under exemptions from Rule 201 Permit to Install requirements.

#### Facility Description:

G-M Wood Products primarily manufactures door jams and trim. They have ~100 employees working 1-2 shifts (currently 2 shifts) five days a week. The manufacturing operation is divided into four plants – Plant 2, Plant 3, Plant 4, and Plant 5 as well as five warehouses. Plant 1 contains G-M Graphics, which is a separate entity from G-M Wood Products and is considered separate by the company. Plant 2 and Plant 5 contains the Millwork Department and manufactures door jams and trim assembly. Plant 3 makes specialty piece or replacement wood trim as well as the two vacuum coating lines. Plant 4 contains the Vinyl Wrapping Department, which adheres vinyl to the wood trim. Based on air quality regulations, all four buildings are considered to be one stationary source.

#### Plant 2:

Plant 2 or the door jam and wood trim assembly has several operations that are regulated by the AQD, wood-working equipment, coating, and assembly with adhesives. The woodworking machines are all connected to an internal baghouse system. The existing woodworking operations and associated baghouse appear to be exempt from Rule 201 permitting requirements under Rule 285(2)(I)(vi)(B).

The wood frames are manufactured and assembled on site. Some parts are finished in Plant 4 if a customer wants vinyl wrapped parts. The assembly process includes the use of an adhesive, which is water based. This process is not exhausted into the ambient air, but is released to the in-plant environment. Material usage records are being kept for this process. Based on the usage, it appears the company is not exempt from permitting requirements of Rule 201.

#### Plant 3

Plant 3 is small scale manufacturing. Mr. Huntley stated that Plant 3 manufactures replacement pieces or parts that are 12 pieces and under. This plant uses the same coatings as Plants 2 and 5. The plant has a variety of wood working equipment which appears to be exemption from permitting under Rule 285(2)(l)(vi)(C). The woodworking equipment is vented to an external cyclone, which, vents back into the plant attached to one roll-off container. A single paint booth was noted with fabric filters in place. Mr. Huntley stated that the paint booth is used for touch ups.

#### Plant 4

Plant 4 is the Vinyl Wrapping Department. In this plant, vinyl is adhered to wood trim via a hot melt adhesive application process. This building also contains office and training space. The hot melt adhesive process appears to be exempt from permitting under Rule 287(2)(i).

#### Plant 5

The primary operations in Plant 5 are wood-working and coating. The facility has a large baghouse approximately 45,000 cfm dust collection system that is being replaced by a larger baghouse approximately 70,000 cfm dust collection system during the month of September 2021. Dust from the baghouse is collected into two roll-off containers.

The dust collection system controls miscellaneous wood working saws, sanding and grinding equipment. The wood-working operations are exempt from permitting under Rule 285(2)(l)(vi)(C).

The Millwork Department also has two vacuum coating lines and one free standing paint booth. The lines are Primer 1 and Primer 2. Both of the Primer lines were in operation at the time of the inspection. The lines are used to prime the wood trim and door jam pieces. The vacuum process minimizes or virtually eliminates over-spray and greatly improves transfer efficiency. They use a water based primer that allows them to use water for the clean-up. They do not use any other solvents for the clean-up.

The free standing paint booth was not operational and is rarely used. Usage records for the coating lines were obtained. Based on a review of the records it appears that the facility is not exempt from Rule 201 permitting requirements.

There is also a 2' by 3' (6 square feet) Safety Kleen parts washer that contains Immersion Cleaner and Cold Parts Cleaner to clean miscellaneous metal parts. This unit is exempt from permitting requirements under a Rule 281(2)(h) exemption.

#### Conclusion

Based on the physical inspection and the records provided, this facility appears to not be in compliance with state and federal Air Quality rules and regulations. Specifically, the facility needs a Permit to Install (PTI) based on usage records of the coatings and adhesives in the three plants and is in violation of Rule 201

NAME Michael T. Cox

DATE 9/28/2021

SUPERVISOR HH