

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

P098068882

FACILITY: Greenville Cabinet Distributing, LLC		SRN / ID: P0980
LOCATION: 1323 Callaghan Street, GREENVILLE		DISTRICT: Grand Rapids
CITY: GREENVILLE		COUNTY: MONTCALM
CONTACT:		ACTIVITY DATE: 08/22/2023
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: On site inspection to assess compliance with air quality rules and regulations.		
RESOLVED COMPLAINTS:		

Introduction

On August 22, 2023, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division (AQD) staff member Scott Evans conducted an on-site inspection of the Greenville Cabinet Distributing facility located at 1323 Callaghan St. in Greenville, Michigan, to assess compliance with the requirements of Permit To Install (PTI) No. 193-18 and all other applicable air quality rules and regulations. This facility has a spray coating booth used to apply finishes to wooden cabinet parts. This spray booth also incorporates drying racks for the coated parts. It has only one permit, PTI No. 193-18, which was approved on November 28, 2018.

PTI No. 193-18

This is a general PTI that includes two Flexible Groups (FG): FG-COATING and FG-SOURCE.

FG-COATING

This FG applies to each coating line and all associated purge and cleanup operations at the facility.

There are two Volatile Organic Compound (VOC) emission limits applied to this FG:

- 2000 lb/month of VOCs per calendar month.
- 10 tpy of VOCs per 12-month rolling time period.

Compliance with these limits is discussed below when discussing record keeping requirements.

This FG has one process restriction that requires that all purge and cleanup solvents and wastes be captured and stored in closed containers before being disposed of properly. During the inspection the waste bins were observed to be closed except when in use. Disposal was discussed and the facility explained that wastes are removed by a contracted company.

This FG has multiple equipment and design parameters. The coating booth is required to use High Velocity Low Pressure (HVLP) spray nozzles or equivalent technology within all coating booths. During the inspection it was verified that proper HVLP nozzles are used at the facility. Spray application can only be used if particulate control is properly installed. The spray booths at the facility were properly equipped with filters that are replaced as needed. During the inspection the filters were in need of replacing soon, but it was evident that filters are regularly replaced, and the booth maintained properly. There are additional rules in the general permit regarding thermal or catalytic oxidizers, however, the facility is not utilizing either and so these requirements are not applicable.

If requested by the AQD, the facility may be required to test and verify the VOC content of utilized coatings. At this time, it is not felt that testing or verification is required.

In regard to recordkeeping, since the facility has no thermal or catalytic oxidizer, associated records are not required from this facility. The facility is still required to maintain chemical compositions of all utilized coatings and solvents provided by manufacturers as well as the following monthly records:

- Purchase records of coatings, reducers, and solvents.
- VOC content of each coating, reducer, and solvent.
- Gallons of each material reclaimed.
- VOC emissions in tons per month for each coating line.
- VOC emissions in tons per year for each 12-month period for each coating line.

The above records were provided upon request and the following emissions maximums were determined:

- Monthly VOC peaked at 408 lbs in August of 2022
- Annual VOC peaked at 2372 lbs in 2022

These maximums demonstrate compliance with the above listed emission limits.

This FG requires that all exhaust be released through an appropriate stack. During the inspection, the stack could be observed releasing vertically upwards as required.

There are additional requirements within this FG regarding replacement of or changes to the coating lines. No such changes have occurred since the issuance of the permit and so these requirements are not currently applicable.

FG-SOURCE

This FG applies to all coating lines and exempt equipment combined. It incorporates one additional emission limit and a recordkeeping requirement that requires the facility to keep monthly and 12-month rolling annual records to demonstrate compliance with the limit. This limit is that no more than 30 tpy of VOCs may be emitted. Records were provided that demonstrated a 12-month period maximum of 2372 lbs, which is compliant with the limit.

Exemptions

The facility has multiple pieces of equipment for cutting, sanding, and otherwise shaping wood products. This equipment is controlled by an internally vented baghouse for comfort within the warehouse. This equipment is all exempt from air permitting requirements under Rule 285(2)(I)(vi).

Conclusion

At the conclusion of the inspection the facility appeared to be compliant with all permitted requirements as well as all other applicable air quality rules and regulations.

NAME Scott Evans

DATE 9/6/2023

SUPERVISOR 