

DEPARTMENT OF ENVIRONMENTAL QUALITY  
 AIR QUALITY DIVISION  
 ACTIVITY REPORT: Scheduled Inspection

N757033829

FACILITY: WESTWOOD LUMBER SALES INC		SRN / ID: N7570
LOCATION: 910 SHELDON COURT, KALAMAZOO		DISTRICT: Kalamazoo
CITY: KALAMAZOO		COUNTY: KALAMAZOO
CONTACT: Tom Ancel, Manager		ACTIVITY DATE: 03/02/2016
STAFF: Monica Brothers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced Scheduled Inspection		
RESOLVED COMPLAINTS:		

This was an unannounced scheduled inspection. Westwood Lumber Sales is a wholesale lumber company that mostly stores and sells lumber, but also has two flow coaters to stain wood for various jobs that require it. They use a variety of water and oil-based coatings/stains. Staff (Monica Brothers) arrived at the facility at 1:00pm and met with Tom Ancel, the facility manager. No visible emissions were seen coming from the flow coater stacks upon arrival at the facility. I handed Tom my business card and the inspection brochure, and I explained that I was here to do an air quality inspection.

First, I asked Tom a few background questions about the facility, and he told me that there are about 13 employees who work one 8-hour shift per day, Monday through Friday. I asked if he had any boilers, cold cleaners, or emergency generators on the property, and he said no. I then told Tom about the types of records I would need from him and he said that he thought he remembered the last inspector saying that, since they're so far under their permit limits, they didn't have to keep records anymore. At one time they did report to MAERS and were marked as a 208a source in the past. They are now considered a true minor. So, perhaps this is what the previous inspector meant, and it just got miscommunicated as not needing to keep records at all. I told Tom that they are currently still operating under PTI #188-07, so they still need to keep records to comply with that permit. Tom made a copy of their permit I brought with me for their reference. Tom then said he would have to get ahold of Charlie Miller, who previously worked at the facility and was responsible for the environmental recordkeeping. Tom left a message with Charlie, and while we waited for a call back, he took me on a tour of the facility.

The majority of the buildings on the property are used only to store the lumber. We went inside the building with the two flow coaters and only one was operating at that time. Two workers were dipping wood pieces (exterior cedar shingles) into the coating and running it between two rollers, which would smooth out the paint evenly onto the surface of the board. The other flow coater is used for longer boards and exterior wood siding panels. I noticed some buckets of coating that did not have lids on them and told Tom that they should always keep solvents and coatings covered, so as to keep them from evaporating into the air as much as possible. He told me that they do keep them covered when they're not in use and that the workers were likely about to use the contents of the buckets. I asked Tom what they do with leftover coatings, and he said that since each job is done with custom color, he usually sends the rest of the unused coating back to the customer with the finished boards. Otherwise, they also sometimes combine it with other leftover paint and thinner, so that they can make a primer out of it and reuse it.

We returned to the office to see if Charlie had called back. Charlie said that he also remembered the previous inspector saying that they didn't need to keep records anymore because they were so far under the limit, but that if they needed to still keep those records, they could easily calculate them using his old spreadsheet system. Tom showed me that they do write down how much VOC, Methylenehexamine, and Ethylbenzene they use for each job, and that it would be just a matter of putting all of these into a spreadsheet to do the required calculations. So, we agreed that by Friday, March 11, 2016 he would send me the recordkeeping requirements, along with the MSDSs for their coatings, thinners, and any other solvent they use. I thanked Tom for his time and left the facility at 1:45pm.

On March 11, 2016, Tom sent me a bit over half of the required calculations and said that they were still working on the other half and should have them to me by early next week. On Wednesday, March 16, 2016, Tom sent me the rest of the documents, along with all of their MSDSs, which can be found in the S Drive/AQD/Reports from Companies. The excel spreadsheets contained all of the required calculations, except for the 12-month rolling calculations, so I asked Tom to send those to me as soon as possible. On Monday, March 21, 2016, I received a spreadsheet via email with the monthly totals of VOC, Methylenehexamine, and Ethylbenzene and totals for each year, but the 12-month rolling calculations

were still not there, so I sent them back an example spreadsheet on how these calculations should be done. The resulting numbers showed that they are way under their limits, with 13.07 TPY VOC (limit: 39.9TPY), 0.0066 TPY Methyl. (limit: 3.17TPY), and 0.125 TPY Ethyl. (limit: 3.87 TPY) being the highest 12-month rolling totals recorded. The facility seems to be in compliance at the time of this inspection.

NAME Monica B. SmithDATE 3/21/16SUPERVISOR MD 3/22/2016