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

A074963421

FACILITY: AMERIWOOD INDUSTRIES		SRN / ID: A0749
LOCATION: 202 Spaulding Street, DOWAGIAC		DISTRICT: Kalamazoo
CITY: DOWAGIAC		COUNTY: CASS
CONTACT: Tracy Fry , Facilities Manager		ACTIVITY DATE: 06/07/2022
STAFF: Rachel Benaway	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-site inspection to	verify compliance with all air use permit conditions ar	nd all state and federal air use regulations.
RESOLVED COMPLAINTS:		

An unannounced inspection of Ameriwood Industries (A0749) was completed by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) staff, Rachel Benaway, on 6/7/2022. Ameriwood Industries was a ready-to-assemble furniture kit manufacturer located in Cass County at 202 Spauding St. in Dowagiac, MI. The purpose of this inspection was to verify Ameriwood is in compliance with their Permit to Install (PTI) #22-18 and all state and federal air use regulations. Ameriwood was a minor source of emissions for particulate matter (PM) and hazardous air pollutants (HAPs). The facility was subject to New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc but no National Emissions Standards for Hazardous Air Pollutants (NESHAPs). The last inspection was completed at the facility on 6/26/2019. Tracy Fry is the Facilities Manager and Building Maintenance Manager and was present for this on-site inspection.

Prior to 2019, the facility used scrap wood and sawdust generated from their particle board furniture kit manufacturing process to fuel a woodfired boiler to heat the building in the winter. The scrap was chipped in a hammermill and stored in a silo. In 2019, a fire damaged the silo, boiler, and the wood grinder. The latter two were completely demolished. The facility brought in a temporary, natural gas fired boiler to resume operations and submitted an Initial Startup Notification on 2/27/2020. Two permanent boilers were installed to heat the facility in November of 2020. The facility did not do an official Rule 278(a) analysis to verify that installation of the new boilers would not trigger significance levels for criteria pollutants, however, both of the new boilers appear to qualify for an exemption from permitting under Rule 282(2)(b)(i). They have a rated heat capacity of 12,186,000 Btu/hr each.

The facility has transitioned from a manufacturer to a distribution center and now only employs 12 to 25 people working 1 shift per day, 5 days a week. The process of dismantling and removing equipment has been occurring since April of 2020 and the buildings are now only used to store parts and products for distribution. This officially occurred on April 13, 2020. Staff took a thorough tour of the facility to verify the removal of the permitted equipment.

At the time of this inspection, Staff observed that the dust transport system from EUSAWDUSTFLTR has been dismantled, the collector on the roof has been disconnected, two small collectors in the parking lot are disconnected, the silo is still there but empty, all other collectors have been removed from the property. The only equipment from EUWOODWORKING that remains on site is one saw, but the dust collection pipes are cut off from the external exhaust system. This saw appears to be exempt from permitting per Rule 285(2)(I)(vi). The hammermills, other saws, and wood hoggers have all been removed. There is a natural gas fired Generac G emergency engine on site that appears to qualify for exemption from permitting under Rule 285(2)(g). There is a parts washer on site that had the lid down with an EGLE operating

procedure sticker displayed. The parts washer appears to qualify for exemption under Rule 281 (2)(h). The equipment for gluing and laminating has all been removed. No HAPs containing materials are stored on site.

The facility has not had any PM or HAPs emissions as of April 13, 2020. Since none of the permitted equipment at the facility has been in operation for over two years, no records were requested at the time of this inspection.

The facility has a consent order with the EPA (EPA-5-18-113(a)0MI-01) from 2018 for opacity issues with the woodfired boiler in violation of conditions that exist in the current state-issued PTI. Staff supplied Mr. Fry with contact information for the EPA Region 5 so that the consent order can be terminated. Staff then informed Mr. Fry how to submit a request to void PTI #22-18 with AQD after the consent order is terminated. Staff has assessed the exempt status of the remaining equipment on site. The facility appears to be in compliance with all state and federal air use regulations at this time.

NAME Kochel Beravoy

DATE 6/30/22 SUPERVISOR RIL 7/21/22