DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

A086925752

FACILITY: STEPHAN WOOD PROD INC		**SRN / ID:** A0869
LOCATION: 605 HURON STREET, GRAYLING		**DISTRICT:** Gaylord
CITY: GRAYLING		**COUNTY:** CRAWFORD
CONTACT:		**ACTIVITY DATE:** 06/12/2014
STAFF: Caryn Owens	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:**
SUBJECT: Field Inspection and Records Review		
RESOLVED COMPLAINTS:		

On June 12, 2014 Caryn Owens and Rob Dickman of the DEQ- AQD conducted a field inspection at Stephan Wood Products located at 609 Huron Street in Grayling, Crawford County, Michigan. The purpose of the field inspection was to determine compliance with permit to install (PTI) 251-95. The facility is considered a minor source which means the source ~~produces~~ emits less than 100 tons per year of VOCs.

DEQ was escorted through the facility by Mr. Erik Flees, the Director of Operations at the facility. The facility assembles wood and composite materials for seats and benches for military vehicles. The processes at the facility entail milling, cutting, drilling, and coating of wood, composite, and metal parts which then are dipped until completely coated, and then hung on racks to dry. Once dry, the part is run through a spray booth, and then an infrared oven. The wood working area at the facility uses a cyclone to control the wood particulate, but this area is grandfathered since it was installed prior to August 15, 1967. The coating line includes the processes of the dip line, spray booth, and infrared oven. The coating line is a batch process and DEQ observed the dip line area with the parts coated and hanging to dry. The spray booth and infrared oven were not in operation during the inspection. DEQ observed clean fabric filters installed in the spray booth, which are changed after each shift.

The following were Mr. Dickman's field observations:
Following are observations made as part of an inspection conducted by Caryn Owens at Stephan Wood Products in Grayling, Michigan on June 12, 2014. The intent of this inspection was to determine the facility's compliance with Michigan Air Pollution Control Rules and Permit to Install Number 251-95.

Prior to entering the facility, no visible emissions or odors were noted from it. Housekeeping around the facility was adequate.

This facility is a defense contractor that makes a number of products including folding bench seating for military vehicles. These activities involve the use of a spray coating line and a coating dip line. Control for the spray line is through dry fabric filters. The dip line is uncontrolled.

The spray line is small consisting of one booth and an associated electric curing oven. The dry fabric filters appeared in good repair. Replacement of these filters is performed as needed. Disposal of them is to a Class II landfill. The coating is applied with an airless sprayer to minimize overspray. Any cleanup solvents and waste coatings are collected and stored in a closed container. As needed, these solvents are disposed using an outside vendor.

The dip line is quite simple in design and is completely done manually one part at a time. Flat long parts are place in a coating filled trough not much bigger than the part itself. The part is removed and hung on a rack to air dry.

In addition to these two lines, there was also various wood and fiberglass cutting and milling operations. Emissions from these operations were controlled by small dust collectors. Wood waste is collected by cyclone and stored in a bin. The bin is then offloaded by conveyor to a truck approximately every other month.

Records Review:
VOC emission rate from the coating line shall not exceed 26.7 pounds per hour, nor 32.0 tons per year, based on a 12-month rolling average. Based on the records reviewed, the highest VOC emission from the coating line was 4.5 pounds per hour, and the facility was at 11.21 tons per year. The facility did not provide 12-month rolling average, but due to the low usage rate, DEQ accepted the tons per month tallies supplied by the company.

The VOC emission rate shall not exceed 6.5 pounds per gallon of coating from the wood parts dip tank, or 3.5 pounds ~~per hour~~ per gallon of coating for the paint spray booth. Based on the material safety data sheets, the highest VOC emission rate was 3.5 pounds per gallon, which is within the permitted conditions for the facility.

DEQ observed no visible emissions from the coating line, however; no painting was occurring at the time of the inspection. A slight solvent odor was observed in the coating line area, but there were parts drying from the dip line. No odors were observed in the storage areas or outside the facility during the inspection.

The facility keeps adequate records of the hours of the coating line; the amount of gallons used and total VOC content of each preservative, coating, lacquer thinner, and solvent used in the dip tank and paint spray booth; the amount of purge and/or clean-up solvent used and reclaimed; and VOC calculations. The facility does not keep 12-month rolling time period of the VOC emissions for the coating line. DEQ recommends keeping these calculations as outlined in PTI 251-95 Appendix A to avoid future violations at the facility. The records at the facility shall be kept for at least two years and made available to the DEQ upon request.

As previously stated, clean exhaust filters were observed in the spray paint booth. The exhaust gases from the coating line are discharged in a vertical stack approximately 30 feet above ground surface. No visible emissions or odors were present from the stack during the inspection.

The facility has a waste storage area outside on the north side of the building. Hazardous waste material is properly stored and disposed appropriately by the facility.

Summary:

Based on the field inspection and records reviewed, DEQ considers the facility in compliance with applicable state air pollution control regulations as well as PTI 251-95. As previously stated, DEQ recommends calculating VOC emissions in tons per year based on 12-month rolling time period as outlined in PTI 251-95 Appendix A to avoid future violations at the facility.

NAME Carolyn Owens DATE 6/24/14 SUPERVISOR