

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

A593730735

| | | |
|----------------------------------|-------------------------------|---------------------------|
| FACILITY: Howard Miller Company | | SRN / ID: A5937 |
| LOCATION: 860 E Main St, ZEELAND | | DISTRICT: Grand Rapids |
| CITY: ZEELAND | | COUNTY: OTTAWA |
| CONTACT: Jerry Winters | | ACTIVITY DATE: 08/11/2015 |
| STAFF: Denise Plafcan | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR |
| SUBJECT: | | |
| RESOLVED COMPLAINTS: | | |

Denise Plafcan (DP) conducted an unannounced scheduled inspection of the facility. The purpose of the inspection was to determine compliance with ROP No. MI-ROP-A5937-2015, and state and federal Air Quality rules and regulations.

Prior to entering the plant, and immediately after the inspection AQD staff conducted surveillance of the area to check for odors, particulate or any unusual operating conditions. No odors, visible particulate problems and no unusual operating conditions noted.

DP met with Jerry Winters, the escort on the inspection, and discussed the Environmental Inspection brochure, the new ROP, NESHAP JJJJJ and any changes at the facility.

The Howard Miller Company (HM) currently operates one shift five days a week. HM manufactures wooden furniture, mainly clocks but also curio cabinets and they have added furniture. The coating operations are composed of three lines; the floor or main line, the wall and mantle line, and the high-end line. There are also several traditional and radio frequency adhesive stations, woodworking equipment, a wood fired boiler, three natural gas boilers (each <1MM Btu/hour), maintenance parts washer, Instapak foam molding packaging line and an emergency generator. The wood finishing lines are made up of eleven grandfathered coating booths and four booths that are permitted. Some rearranging of the booths has occurred to improve the flow of the pieces but the integrity of the lines has not been modified. Coatings applied in the operations are stains, washcoats and sealers, fillers, glazes, and lacquers. Exhaust from coating booths are vented externally through dry fabric filters and stacks.

The wood waste boiler (EUWOODBOILER1) was installed in 1983 and is subject to 40 CFR 63.11237 (NESHAP JJJJJJ)for existing area source biomass boilers (FGAREASOURCEBOILER). DP explained to Jerry that the State of Michigan does not have delegated authority to regulate 40 CFR 63.11237 for Minor HAP sources (area sources). Howard Miller is considered an area source for HAPs since they have a HAPs opt-out incorporated into their ROP. Since EPA has not funded the State to enforce the regulation, a FGAREASOURCEBOILER compliance determination was not made at the time of this inspection.

The emergency back-up generator was installed in 2008 and is subject to 40 CFR Subpart Reciprocating Internal Combustion Engines (RICE) MACT . However, the company was informed that the State of Michigan does not

have delegated authority to regulate the RICE MACT for Minor HAP sources (area sources). Howard Miller is considered an area source for HAPs since they have a HAPs opt-out incorporated into their ROP. Since EPA has not funded the State to enforce the regulation, a RICE compliance determination was not made at the time of this inspection. The back-up generator is quite small slightly larger than a residential unit.

A new Building Maintenance System (BMS) has replaced the old Stafea alarm system mentioned in previous inspection reports. The BMS is available to view on a monitor in the maintenance area and has visual readouts that correspond to the layout of the system. There are both an audible and visual alarm if there is anything wrong with the system. Sam Meyers, Maintenance Supervisor, provided access to records and maintenance logs for the boiler and wood particulate handling system.

The plant inspection included the mill area, boiler and silo (both not operating during the inspection), dust collection equipment, mixing kitchen, assembly and coating areas of the plant. The company receives a detailed composition report from their supplier listing all of the chemicals and quantities for every material used at the site. This summary report is received at a minimum every six months and used to adjust the usage records to precisely reflect the actual emissions.

Source Wide Conditions

I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period/ Operating Scenario | Equipment |
|---------------------|------------------------------|------------------------------------|--|
| Each Individual HAP | Less than 9.0 tons per year | 12-month rolling time period | Between January 1, 2015 and July 1, 2015 the facility emitted 3198 pounds of aggregate HAPs. See the NESHAP JJ Semi-annual compliance submittal. |
| Aggregate HAPs | Less than 22.5 tons per year | 12-month rolling time period | |

TESTING/SAMPLING

1. No testing or sampling conducted as part of this compliance inspection

MONITORING/RECORDKEEPING

1. All required calculations and records are being maintained electronically and formulation data for all materials are submitted at a minimum every 6 months, closer to every month, by their supplier.

REPORTING

1. All reporting is being completed and submitted as required. The Annual and Semi-Annual Compliance Certification reporting reviews are documented in MACES and included on the FCE report.

EMISSION UNIT SUMMARY TABLE AND CONDITIONS

| Emission Unit ID | Emission Unit Description (Including Process Equipment & Control Device(s)) |
|------------------|--|
|------------------|--|

| Emission Unit ID | Emission Unit Description (Including Process Equipment & Control Device(s)) |
|------------------|--|
| EUWOODBOILER1 | One Steelcraft Vyncke underfeed stoking boiler. It is 300 hp and 10,000,000 Btu/hr and has an underfeed auger system, automatic feed system for solid wood waste. The boiler burns waste material from the wood working operations. |
| EUSILO | A 21'D x 32'H silo, silo unloading system and ash separation system for the wood waste boiler which burns sawdust and waste material from the wood working operations. The sawdust removal system is designed to control particulate emissions while unloading the dust collectors. Sawdust is transported from dust collector to either an enclosed 50 yard dumpster or to the wood fired boiler storage silo. The system is a closed loop, thereby, reducing particulate emissions significantly. Each collector deposits sawdust through an airlock and disperses it by means of a broadcaster into a 12" main line. The MAC dust collector has a flow rate of approximately 6,000 CFM. |
| EUWOODEQUIP1 | Alanco baghouse with a flow rate of 85,521 CFM. Externally vented during warm weather and air returned to the plant during cold weather. |
| EUWOODEQUIP2 | Two Wheelabrators - Frye dustube dust collector, #30, model 126 double K/D type. Each has a cloth area of 10,080 square feet to filter 33,500 CFM of air. Cloth ratio is 3.32 to 1 with standard dust tubes. Externally vented during warm weather and air returned to the plant during cold weather. |
| EUWOODEQUIP3 | Reverse air type baghouse dust collector - Dustar 7,045 square feet of filter media. Has attached storage bin to hold 80 cubic yards of material and vibrating bin discharge on dust collector. Capacity of 75,000 CFM. Removes sawdust from various woodworking equipment. The baghouse is equipped with a gauge to measure the pressure drop. Externally vented during warm weather and air returned to the plant during cold weather. |
| EUSPRAYBOOTH1 | Eleven spray booths and accompanying internally vented ovens used for surface coating of wood clocks and wood accent furniture. The spray booths have mat exhaust filters to capture overspray and are externally vented. |
| EUSPRAYBOOTH2 | Four spray booths and accompanying internally vented ovens used for surface coating of wood clocks and wood accent furniture. The spray booths have mat exhaust filters to capture overspray and are externally vented. |
| EURULE287 | There isn't any Rule 287 or Rule 290 exempt equipment at the facility. |
| EURULE290 | |
| EUCLDCLNR | Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979. |

| Emission Unit ID | Emission Unit Description (Including Process Equipment & Control Device(s)) |
|------------------|---|
| EUMISC331 | Any future or existing emission unit that emits air contaminants which are subject to Rule 336.1331 requirements. |

EUWOODBOILER1 CONDITIONS**DESCRIPTION**

One Steelcraft Vyncke underfeed stoking boiler. It is 300 hp and 10,000,000 Btu/hr and has an underfeed auger system, automatic feed system for solid wood waste. The boiler burns waste material from the wood working operations. The boiler was not operational since it only operates during the winter heating season and is used to supply heat to the plant and the main office building as well.

EMISSION LIMIT

| Pollutant | Limit | Equipment | |
|--------------------|---|-----------|--|
| Particulate Matter | 0.50 pound per 1,000 pounds of exhaust gases corrected to 50% excess air ² | Boiler | No testing was required as part of this compliance inspection. |

PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall only burn waste material from the wood working operations. The boiler is only used during the heating season and burns wood waste and sawdust. The boiler was not operational at the time of the inspection.

MONITORING/RECORDKEEPING

1. The permittee shall conduct a daily non-certified opacity observation, during operating season. Maintain a log of date, time, location and opacity reading. Daily opacity observations are being conducted and documented in a log book kept in the maintenance area. Log entries were reviewed during the inspection and records are being maintained correctly.
2. The permittee shall conduct monthly certified visual emission readings using 40 CFR, Part 60, Appendix A, EPA Method 9, during operating season. Maintain a log of date, time, location and opacity reading. Certified visual emissions are being conducted and documented in a log book kept in the maintenance area. Log entries were reviewed during the inspection and records are being maintained correctly. Two employees are certified at the October smoke school class which covers certified visual emission readings during the winter operating season.

REPORTING

1. All reporting is being completed and submitted as required. The Annual and Semi-Annual Compliance Certification reporting reviews are documented in MACES.

STACK/VENT RESTRICTION(S)

1. The exhaust gases from the Stack & Vent ID SVWOODBOILER shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted and have a Maximum Exhaust Dimensions of 25 inches

and a Minimum Height Above Ground 62.3feet. Stack dimensions were not verified during this compliance inspection.

OTHER REQUIREMENT(S)

1. The permittee has implemented an acceptable Preventative Maintenance Plan and maintains all appropriate associated records to document any maintenance.

EUSILO EMISSION UNIT CONDITIONS

DESCRIPTION

A 21'D x 32'H silo, silo unloading system and ash separation system for the wood waste boiler which burns sawdust and waste material from the wood working operations. The sawdust removal system is designed to control particulate emissions while unloading the dust collectors. Sawdust is transported from dust collector to either an enclosed 50 yd dumpster or to the wood fired boiler storage silo. The system is a closed loop, thereby, reducing particulate emissions significantly. Each collector deposits sawdust through an airlock and disperses it by means of a broadcaster into a 12" main line. The MAC dust collector has a flow rate of approximately 6,000 CFM.

FLEXIBLE GROUP ID: FGPMCAMPLAN

POLLUTION CONTROL EQUIPMENT Baghouse and cyclone

EMISSION LIMIT

| Pollutant | Limit | Equipment | |
|--------------------|---|-----------|--|
| Particulate Matter | 0.1 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis. | Silo | No testing was required as part of this compliance inspection. |

PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the silo operations unless the cyclone and fabric filter dust collector are installed and operating properly. Silo was not in use during the inspection but the area around the dust collection equipment was very clean and well maintained.

MONITORING/RECORDKEEPING

1. The permittee shall conduct a daily non-certified opacity observation, when system is operating and maintain a log of date, time, and opacity reading. The silo does not operate during the summer months. In the fall they begin to fill the silo and keep it filled during the heating season opacity observations are being conducted during the winter months when observations are conducted of the entire sawdust handling system.

REPORTING

1. All reporting is being completed and submitted as required. The Annual and Semi-Annual Compliance Certification reporting reviews are documented in MACES.

OTHER REQUIREMENT(S)

1. The permittee has implemented an acceptable Preventative Maintenance Plan and maintains all appropriate associated records to document any maintenance. Records were reviewed on site in the maintenance room.

FLEXIBLE GROUP SUMMARY TABLE

| Flexible Group ID | Flexible Group Description | Associated Emission Unit IDs |
|-------------------|--|---|
| FGWOODEQUIP | Dust collection equipment for the woodworking operation including baghouses and cyclones which operate in series. See The Emission Unit Summary Table for details of each baghouse | EUWOODEQUIP1 EUWOODEQUIP2 EUWOODEQUIP3 |
| FGNESHAPJJ | This flexible group consists all equipment at the stationary source including equipment covered by NSR permits, grandfathered equipment, and exempt equipment involved in surface coating of wooden furniture that meet the requirements in 40 CFR Part 63, Subpart JJ, 63.8 and are thereby subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture. | EUSPRAYBOOTH1 EUSPRAYBOOTH2 EURULE287 EURULE290 |
| FGPMCAMPLAN | Any existing and future particulate emission sources subject to the requirements of a Compliance Assurance Monitoring Plan. | EUSILO EUWOODEQUIP1 EUWOODEQUIP2 EUWOODEQUIP3 EUMISC331 |
| FGRULE287(c) | Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and Rule 287(c). | EURULE287 |
| FGRULE290 | Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290. | EURULE290 |
| FGCOLDCLEANERS | Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979. | EUCLDCLNR |

| Flexible Group ID | Flexible Group Description | Associated Emission Unit IDs |
|--------------------|---|------------------------------|
| FGAREASOURCEBOILER | Any existing (10 MMBtu/hour heat input) biomass-fired industrial, commercial or institutional boiler as defined in 40 CFR 63.11237 (excluding seasonal and limited-use boilers and boilers equipped with oxygen trim systems) that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2, except as specified in 40 CFR 63.11195. | EUWOODEQUIP1 |

FGWOODEQUIP DESCRIPTION AND CONDITIONS

Dust collection equipment for the woodworking operation including baghouses and cyclones which operate in series. See the Emission Unit Summary Table for details of each baghouse.

Emission Units: EUWOODEQUIP1, EUWOODEQUIP2, EUWOODEQUIP3

POLLUTION CONTROL EQUIPMENT: Baghouses and cyclones

EMISSION LIMIT(S)

| Pollutant | Limit | Equipment | |
|-------------|--|------------------------------|---|
| Particulate | 0.01 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis. | EUWOODEQUIP2 EUWOODEQUIP3 | No testing was requested as part of this compliance inspection. |
| Particulate | 0.01 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis. | EUWOODEQUIP1 | No testing was requested as part of this compliance inspection |

PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the woodworking operations controlled by EUWOODEQUIP2 and EUWOODEQUIP3 baghouse and cyclone dust collection systems unless the baghouses and cyclones are installed and operating properly. All baghouses and cyclones were operating properly. The area where the dust collectors are located was extremely clean and well maintained.
2. The permittee shall not operate the woodworking operations controlled by EUWOODEQUIP1 baghouse and cyclone dust collection system unless the baghouses and cyclones are installed and operating properly. All baghouses and cyclones were operating properly. The area where the dust collectors are located was extremely clean and well maintained.

MONITORING/RECORDKEEPING

1. The permittee shall conduct a daily non-certified opacity observation of the control device and associated duct work, when the system is operating and maintain a log of date, time, and opacity reading. Opacity observations are

being conducted daily when the system is operating. Logs are kept in the maintenance area and include date, time, opacity and notations if there were any problems or comments about the equipment. All records were reviewed on site during the inspection.

REPORTING

1. All reporting is being completed and submitted as required. The Annual and Semi-Annual Compliance Certification reporting reviews are documented in MACES.

OTHER REQUIREMENT(S)

1. The permittee shall implement an acceptable Preventative Maintenance Plan. Any changes to the Preventative Maintenance Plan shall be submitted to the AQD District Supervisor for review. Maintenance and repair records are being maintained and were reviewed on site during the inspection.

The area surrounding the dust control system was extremely clean, orderly and well maintained.

FGNESHAPJJ CONDITIONS

FGNESHAPJJ - This flexible group consists of all equipment at the stationary source including equipment covered by NSR permits, grandfathered equipment, and exempt equipment involved in surface coating of wooden furniture and that meet the requirements in 40 CFR Part 63, Subpart JJ, 63.8 and are thereby subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture.

Emission Unit: EUSPRAYBOOTH1, EUSPRAYBOOTH2, EURULE287, EURULE290

DESCRIPTION

FGNESHAPJJ - This flexible group consists of all equipment at the stationary source including equipment covered by NSR permits, grandfathered equipment, and exempt equipment involved in surface coating of wooden furniture and that meet the requirements in 40 CFR Part 63, Subpart JJ, 63.8 and are thereby subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture.

Emission Unit: EUSPRAYBOOTH1, EUSPRAYBOOTH2, EURULE287, EURULE290

PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee is complying with the Work Practice Standards noted in 40 CFR 63.803.

TESTING/SAMPLING

1. The permittee is complying with the requirements of 40 CFR 63.805 and all recordkeeping is being maintained on a monthly basis and then evaluated every 6 months for accuracy based on suppliers formulation data. See copy of records submitted with the NESHAP JJ Semi-annual Compliance Certification.

MONITORING/RECORDKEEPING

1. Recordkeeping Requirements for the averaging approach are being maintained as required in 40 CFR 63.10 of Subpart A.
2. Finishing Operations - Averaging Approach
Howard Miller continues to use the averaging method of compliance instead of the compliant coating option just in case a specialty coating is above the 1.0 lbs of VHAPs per lbs of solids. Using the averaging approach the highest 2015 monthly average from January 1, 2015 to July 1, 2015 was at 0.2 pounds of VHAPs per pound of solid, well below the limit of 1.0 pound of VHAPs per pound of solid. All records to support the calculations are being maintained electronically and were reviewed when submitted with the NESHAP JJ Semi-annual Compliance Certification.
3. Work Practice Plan
 - a. The owner or operator is maintaining on-site, the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
 - i. Records demonstrating that the operator training program required by 63.803(b) is in place and is being conducted annually for all coating operators and some management personnel. DP reviewed training records, maintained in the HR offices and they were up-to-date.
 - ii. Records collected in accordance with the inspection and maintenance plan required by 63.803(c) inspection and maintenance are being conducted and tracked in logs kept on the manufacturing floor.
 - iii. Records associated with the cleaning solvent accounting system required by 63.803(d) cleaning solvent is being tracked electronically.
 - iv. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semi-annual period as required by 63.803(h)(5), no conventional air spray guns are in use at the plant. Are guns are tested and optimum operational pressures are posted above the booths to be sure the operators are using the guns properly and to indicate possible problems such as leaks or malfunctions before they occur.
 - v. Records associated with the formulation assessment plan required by 63.803(l); a FAP plan is not required because no VHAPs of Potential Concern are in use.
 - vi. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed are being maintained on the plant floor .
4. The owner or operator is following the compliance provisions of 63.804(f) (1), (2), (3), (5), (7) and (8) and 63.804(g) (1), (2), (3), (5), (7) and (8), and is maintaining records of the compliance certifications submitted in accordance with 63.807(c) for each semiannual period following the compliance date. Compliance certification records are being maintained and reports are being received in a timely manner.

REPORTING

1. All reporting is being completed and submitted as required. The Annual and Semi-Annual Compliance Certification reporting reviews are documented in MACES.
2. All 40 CFR 63 Subpart JJ reporting is being completed and submitted as required in 40 CFR 63.807. The Annual and Semi-Annual Compliance

Certification 40 CFR 63 Subpart JJ reporting reviews are documented in MACES.

OTHER REQUIREMENT(S)

1. The permittee shall implement a written startup, shutdown and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63 Subpart JJ. The permittee has a SSM plan and is maintaining records regarding the corrective action for any malfunctions as required.

Material usage records continue to be maintained by Ray Feenstra. Formulation data from the supplier is updated every six months, so all calculations required for Title V semi-annual reporting are based on the most recent and accurate formulation information. With the detailed formulation data Ray has the ability to flag a particular ingredient and track it throughout all the coatings being used. This database is used for numerous governmental reporting requirements and is an excellent example of an efficient and thorough record keeping and reporting system. Because formulation data, direct from the supplier, is used for compliance the company maintains MSDSs instead of CPDSs. They currently use positive numbers to represent the material usage quantity. A negative number is used for any material that was listed as being used to produce a particular piece but for some reason was not the actual material or quantity used and it was actually still in inventory. As an example, if a particular clock is typically made with 0.5 gallons of cherry stain identified as CS123 and this time they are actually making a run of clocks with 0.5 gallons of maple stain identified as MS123. When that particular clock is made they automatically flag the typical coating formulation and then they also enter the specialty coating separately. When the records are verified the CS123 is then removed from reporting as a negative number. In the NESHAP coating averaging records they subtract out the excess material but it may cause an overlap into the next month. Since they are at less than 0.2 lbs of VHAPs per lbs of solids which is below the limit of 1.0 lbs of VHAPs per lbs of solids the accounting that carries over into the next month is not an issue with compliance.

FGPMCAMPLAN CONDITIONS

DESCRIPTION

Woodworking operations that produce sawdust (particulate) which is captured and transferred to a baghouse dust collection system.

Emission Unit: EUSILO, EUWOODEQUIP1, EUWOODEQUIP2, EUWOODEQUIP3, EUMISC331

POLLUTION CONTROL EQUIPMENT: Baghouse and cyclones

PROCESS/OPERATIONAL RESTRICTION(S)

1. Building Management System(BMS) must be installed and operating properly when any of the following are operational EUSILO, EUWOODEQUIP1, EUWOODEQUIP2 and EUWOODEQUIP3. An upgraded new BMS has been installed and replaced the Stafea system. The new

system is very “user” friendly and has visual and audible alarms. This system is much easier to use and is able to track all operations including pressure drops. The new system seemed to be operating properly at the time of the inspection. The BMS is available to staff through the computer system and select staff can be notified remotely by computer or cell phone if there is something wrong with the operation of the baghouse system.

DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall maintain the differential pressure gauge and associated equipment in proper operating condition. The differential pressure gauge and associated equipment was installed and operating and can easily be monitored on the computer terminal in the maintenance room.

MONITORING/RECORDKEEPING

All records are being maintained a minimum of five years.

1. Pressure drop across each baghouse shall be measured with a differential pressure gauge and shall be manually recorded once daily when the woodworking equipment is operational. There is a daily reading recorded on a clipboard attached to the control panel for the baghouses located outside of the maintenance area. The new building maintenance computer program is continuously monitoring the pressure drop and the alarm is triggered if there is a problem both Jerry and Sam have remote access to the alarm system.
2. The permittee shall initiate the plan, procedures and specifications outlined in Appendix 3 if the pressure exceeds 10.0 inches of water or drops below - 1 inches of water based on the daily readings or if the Alarm is activated when the woodworking equipment is operational. Based on a review of the logs on site it appears the proper procedures are being followed when/if an alarm is activated.
3. The permittee shall perform and record the results of a daily visible emission check when the baghouses are being externally vented, during routine normal operating conditions. If visible emissions are observed, the plan, procedures and specifications outlined in Appendix 3 shall be initiated. A daily emission check is being conducted during normal operating conditions and recorded as required.
4. The permittee shall conduct pressure drop readings and visible emission observations at all required intervals that the equipment is operating. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide

valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. The BMS system is a continuous monitor of operations.

5. The permittee shall, at all times, maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. Monitoring equipment is being maintained properly and routine repairs conducted appropriately by an outside company and invoices were available for review.
6. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. Records are being maintained.

REPORTING

1. All reporting is being completed and submitted as required. The Annual and Semi-Annual Compliance Certification reporting reviews are documented in MACES and have been submitted in a timely manner.
2. Each semiannual report of monitoring deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. The excursion and exceedance report is being submitted as required using the appropriate form. A review of the submittal reporting any excursions or exceedances is included in the Annual and Semi-Annual Compliance Certification report review documented in MACES.
3. Each semiannual report of monitoring deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. The monitor downtime report is being submitted as required using the appropriate form. A review of the submittal reporting any monitor downtime is included in the Annual and Semi-Annual Compliance Certification report review documented in MACES.

OTHER REQUIREMENT(S)

1. Based on records it appears that upon detecting an excursion or exceedance, the permittee is following good air pollution control practices for minimizing emissions to restore operation of the baghouse to its normal or usual manner of operation as expeditiously as practicable. All records were reviewed on site and are being maintained in the maintenance area.
2. The permittee appears to be in compliance with all requirements of CAM 40 CFR Part 64.

3. No failures of compliance reported
4. At this time the permittee is not required to submit a QIP.

**FGCOLDCLEANERS CONDITIONS
DESCRIPTION**

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). The facility has new cold cleaners since they were placed into operation in 1983. The cold cleaners are less than 10 square feet and do not use any halogenated compounds.

FGAREASOURCEBOILER - Existing Biomass

This regulation was not evaluated as part of this compliance determination.

DP finished the inspection with a closing meeting with Jerry and Michael Wallace the responsible official. There were no issues of concern mentioned during the meeting by either DP or representatives from Howard Miller. DP did note that everything was very well organized, easily accessible and they maintain excellent records.

Based on the physical inspection and review of records this facility appears to be in compliance with state and federal AQ rules and regulations ROP No. MI-ROP-A5937-2015.

NAME

Denise Plapra

DATE

8.25.15

SUPERVISOR
