

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

B033360187

<b>FACILITY:</b> IRWIN SEATING COMPANY		<b>SRN / ID:</b> B0333
<b>LOCATION:</b> 3251 FRUITRIDGE ROAD NW, GRAND RAPIDS		<b>DISTRICT:</b> Grand Rapids
<b>CITY:</b> GRAND RAPIDS		<b>COUNTY:</b> KENT
<b>CONTACT:</b> James Wilson , Plant Manager		<b>ACTIVITY DATE:</b> 08/26/2021
<b>STAFF:</b> Michael Cox	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> MINOR
<b>SUBJECT:</b> Scheduled Unannounced Inspection		
<b>RESOLVED COMPLAINTS:</b>		

Air Quality Division AQD) staff Michael Cox (MTC) arrived at Irwin Seating Company located at 3251 Fruitridge Road, N.W., Grand Rapids, MI at 1:00 pm on Thursday August 26, 2021. The purpose of this inspection was to verify compliance with Permit to Install No. 271-91 and all other applicable air quality rules and regulations. MTC contacted Mr. James Wilson, Facility Manager, and Mr. Jason Bumstead, Maintenance Engineer, to conduct the inspection. Mr. Bumstead conducted the facility tour, while Mr. Wilson had to leave. No visible emissions or odors were noted upon arrival.

#### **Facility Description:**

Irwin Seating is primarily a manufacturer of auditorium and stadium seating. The current manufacturing at the company includes metal working, which appears to be exempt from Rule 201 permitting requirements under Rule 285(2)(l)(vi)(B) and the welding operations appear to be exempt from Rule 201 permitting requirements under Rule 285(2)(i).

Irwin currently operates under Permit to Install 271-9, which covers the wet-coat booths. Since the last inspection that was conducted on February 26, 2014, Irwin Seating Company has voided permits that covered the three powder coating lines (Permit to Install Nos. 163-87 and 1330-91) and the wood grinding, cutting, sanding stations including a laser cutter, sewing, hot melt gluing and wood gluing (Permit to Install 618-77).

#### **Woodworking Equipment and associated Carter Day Filter System**

Woodworking operations consist of cutting, grinding, sanding, etc. The particulate is collected in the Carter Day filter system. The combined cfm is less than 30,000 cfm. The sawdust is collected in large haul away bins which are connected to the system with flexible ductwork. The woodworking operations appear to be exempt from permitting under Rule 285(2)(l)(vi)(C).

#### **Three Metal Powder Coating Booths (Powder 1) and Powder Coating Line (Powder 2)**

Powder Coating lines were observed during the facility tour. These Powder Coating lines appear to be exempt from permitting requirements under Rule 287(2)(d). The exemption covers all equipment utilized in the powder coating process, booths, control, and ovens.

#### **PTI No. 271-91 – Wood Furniture Coating Operations**

This permit covers nine (9) paint spray booths, two (2) dip stations which have been removed, and five glue roller/presses. All of the booths are located in one general area of the facility, but there are two products that are made. There are five booths on the main finish line. The flat-work uses primarily water-based coatings and has one production coating booth as well as a sample booth that coats the seat and back of the chair which are then air-dried. The arm block area finishes the arm rests of the chair and has three spray booths and a large dehumidifier that is used to cure parts.

The glue roll coaters use typical carpenter's wood glue which is pumped from the tote to the line. Some of the glue is florescent under a black light, which enables them to note any errors or excess glue. In the seat assembly area foam is cut using serrated knives and glued to the chairs.

The wood furniture coating process is limited to 40 tons per year (tpy) of volatile organic compounds (VOCs) and 45 pounds per hour of VOCs, based on a revision made to Permit to Install PTI 271-91 on July 21, 1993. Records of VOC emissions and VOC content of the coating material were requested for the time period of January 2020 through August 2021; however, these records were never received. Therefore, a determination of VOC emissions compliance could not be made. This is a violation of the recording requirements of Special Condition 18 (SC 18). No visible emissions were noted coming from the coating operation during the site tour. Testing to verify VOC emission rates from the coating process has not been requested by AQD.

The facility is required to keep usage records of coating used in the process per Special Condition 17 (SC 17). Records of coating usage were requested for the time period of January 2020 through August 2021. Usage records were received and reviewed, but it appears that only September 2021 was represented in the records. MTC requested from Mr. Wilson the other months in the specified time period (January 2020 through August 2021) via email on September 7, 2021, but the records were never received. It also appears that VOC content of the materials in the usage record provided is not accurate. On site verification of a coating being used (Sher-Wood 9410W HV Precatalyzed, 40 Gloss) was noted to have a VOC content of 0.48 pounds per gallon. The lack of records is a violation of Special Condition 17. From the submitted usage records, no VOC content was recorded. All coatings used by the facility were stated to be water based. All booths were observed during the site visit and were noted to have dry filters in place.

Thirteen stacks were observed during the site tour. The stacks appeared to be consistent with Permit to Install PTI No. 271-91.

### **Conclusion:**

Based on observations made at the time of the inspection and lack of records, Irwin Seating Company appears to not be in compliance with Permit to Install No. 271-91 and all applicable Air Quality rules and regulations. Specifically, Irwin Seating Company was found to not be adequately keeping records of VOC emissions, VOC content, and Usage as required by Special Condition 17 (SC 17) and Special Condition 18 (SC 18).

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NAME Michael T. Cox

DATE 9/28/2021

SUPERVISOR HH