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

N750163384		
FACILITY: KINDEL FURNITURE COMPANY, LLC		SRN / ID: N7501
LOCATION: 4047 EASTERN AVENUE SE, WYOMING		DISTRICT: Grand Rapids
CITY: WYOMING		COUNTY: KENT
CONTACT: Dennis Patterson, Vice President		ACTIVITY DATE: 06/28/2022
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection and met with Dennis Patterson, Vice President of Finance, Tony Clocko, Production Manager and Joshua Holesinger, Maintenance Manager. Upon arrival, no odors were identified.

I informed Mr. Patterson that this was a routine, scheduled inspection that would include a record keeping review and facility walk-through.

FACILITY DESCRIPTION

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Kindel Furniture Company is a residential and contract furniture manufacturing company. This includes woodworking activities as well as staining and painting. The wood particulate emissions generated from woodworking equipment is ducted to a baghouse and is exempt from permitting pursuant to Rule 285(2)(I)(vi). There are 7 total paint booths at the facility that are exempt from permitting pursuant to Rule 287(2)(c). The facility also operates as a Synthetic Minor facility for Hazardous Air Pollutants pursuant to Opt-out Permit to Install No. 185-05D.

COMPLIANCE EVALUATION

Mr. Clocko provided me with a tour of the facility and information on the operations. Kindel uses a variety of raw materials to make high end custom furniture as well as furniture made to order with a veneer finish. The baghouse vents externally during the summer and is re-routed back into the building in the winter months to save heat.

In the finish area, the filters in the first booth observed had a large gap. Mr. Clocko went into the booth to correct the gap and spoke to the operator to ensure this practice does not continue. One other booth had a small gap, and it was obvious that the material being sprayed was traveling to that area based on material accumulation. I mentioned this to Mr. Clocko as well. All other booth filters appeared acceptable, and we discussed proper placement and replacement. We also discussed keeping lids on any open containers of solvent as a best management practice. I did not observe this to be an issue during the inspection.

The booth material tracking sheets are kept in the finish area which are the basis for the recordkeeping and the painters generate a weekly report and send it to the office for integration into the emissions spreadsheet. I sent an email to Jane Collier, Purchasing Director and Mr. Patterson requesting records to demonstrate compliance with the Rule 287(2)(c) exemption and the permit and the information was sent to me immediately.

Mr. Clocko escorted me to the baghouse located on the outside of the building on the north side. An inspection of the area found that an unacceptable amount of wood debris/particulate matter from the baghouse had accumulated on the ground around the unit. The wood debris/particulate matter was both old and new. Additionally, there was wood particles in the air around the unit that appeared to be escaping from the ductwork after the baghouse. I did not observe any pressure drop gauge for the unit. I requested information on the pressure drop gauge and maintenance activities and learned that the unit is not equipped with a gauge and there is not a formal maintenance program.

The presence of the large quantity of both old and new wood debris/particulate matter is a violation of Rule 370, for failure to properly collect and dispose of an air contaminant in a manner so as to minimize the introduction of contaminants to the outer air. The fact that wood debris/particulate matter was in the air around the baghouse because it was leaking from the baghouse ductwork is a violation of Rule 910 for failure to properly maintain and operate an air-cleaning device. A Violation Notice will be issued. The Violation Notice will also include a request for a Malfunction Abatement/Preventative Maintenance Plan pursuant to Rule 911.

Records to demonstrate compliance with Rule 287(2)(c) are maintained on an individual booth basis as required. Booth 8 is the largest user of coatings, and the highest monthly gallons used between January 2021 and May 2022 was in March of 2021 at 131.5 gallons. Booth 8 usage for May 2022 was 123.0 gallons. The records indicate compliance with the requirements of 287(2)(c).

Emissions of Hazardous Air Pollutants (HAP) are limited by Opt-out PTI No. 185-05D to less than 9.0 tons per 12-month rolling time period for each individual HAP. The highest reported individual HAP reported for the 12-month period ending May 2022 was ethylene glycol monophenyl ether at 0.144 tons.

Emissions of HAP are limited to less than 22.5 tons per 12-month rolling time period for aggregate HAPs. The total reported HAP for the 12-month period ending May 2022 was 2.24 tons. The records include emissions of methyl ethyl ketone (MEK) which is no longer a HAP and can be removed from the HAP aggregate total.

Recordkeeping for the facility appears to be maintained as required by the permit and the permit exemptions on a per booth basis. The recordkeeping is acceptable and is attached.

The facility is also maintaining a record of total Volatile Organic Compound emissions which are reported at 2.825 tons for the 12-month rolling time period ending May 2022.

CONCLUSION

Kindel Furniture Company was in non-compliance at the time of the inspection.

NAME April Lazzaro

Tic Grinstern DATE 06/30/2022 SUPERVISOR for Heidi Hollenbach