

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

N809768336

FACILITY: Lumbermen's Finishing Division		SRN / ID: N8097
LOCATION: 3903 ROGER B CHAFFEE MEMORIAL BLVD, WYOMING		DISTRICT: Grand Rapids
CITY: WYOMING		COUNTY: KENT
CONTACT: Brian Stopinski , Production Manager		ACTIVITY DATE: 07/11/2023
STAFF: April Lazzaro	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff, April Lazzaro arrived at the facility to conduct an unannounced, scheduled inspection of Lumbermen's Finishing Division (Lumbermen's). The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations. No visible emissions or odors were noted upon arrival at the facility. No odors or visible emissions were observed. AQD staff met with Brian Stopinski, Production Manager who accompanied me on the inspection.

FACILITY DESCRIPTION

Lumbermen's is a wood siding and shingle coating facility that operates pursuant to General Permit to Install (PTI) No. 58-09, for one coating line used to coat exterior siding and interior pine and cedar, which was modified in December 2017 to include an additional similarly functioning spray line and Opt-out PTI No. 173-17 which limits Hazardous Air Pollutants (HAP) below minor source thresholds. Additionally, there are three (3) additional coating applicators that are exempt pursuant to Rule 287(2) (c), which are named Shingle Line 1, Shingle Line 2, and Edge Coater.

COMPLIANCE EVALUATION

General PTI No. 58-09

FG-COATING

This flexible group includes Flatline 1 and 2 and limits emissions of Volatile Organic Compounds (VOC) to 2,000 lbs per month and 10 tons per 12-month rolling time period. Both lines utilize water-based coatings and use water for cleanup. All the water used for cleanup is placed into totes, and a waste water hauler comes weekly to empty the totes for proper disposal. Each booth is equipped with one spray applicator and proper filtration which consists of two sets of filters. The outer filters are replaced approximately every 2-3 hours and the inner filters are replaced daily.

The coating mix area utilizes a computerized dispensing system that helps the facility track usage which gets entered into a spreadsheet. A request for the emissions for 2022 and 2023 were requested and received timely. During a follow up question to the company, the consultant reached out to state they had identified an error and sent an updated spreadsheet for 2023. The error had to do with copying over 2022 data to the 2023 sheet. I noted that the company is reporting emissions based upon the worst-case coating that the facility uses. Mr. Stropinski stated that the amounts of coating recorded come from the paint room; and that every gallon of paint made is recorded/inventoried and noted which line it was made to be used on. The highest amount of monthly emissions for Flatline 1 in the past 12-months was August of 2022 at 428.16 pounds of VOC. The highest amount recorded for Flatline 2 was February 2023 at 332.40 pounds of VOC. The highest 12-month rolling total for Flatline 1 was the period ending January 2022 at 2.42 tons. The most recent 12-month rolling total ending in June 2023 is 2.01 tons. The highest and most recent 12-month rolling total for Flatline 2 was the period ending June 2023 at 1.61 tons. Values in the spreadsheet indicate compliance with the emission limits.

An evaluation of the process/operational restrictions, design/equipment parameters and monitoring/recordkeeping for Flatline 1 and Flatline 2 indicates compliance. It is noted however, that while water is used to clean the equipment, housekeeping for each Flatline needs improvement.

FG-SOURCE

This flexible group applies to all coating lines and associated purge and clean-up operations at the stationary source, including exempt equipment. The VOC emissions are limited to 30 tons per 12-month rolling time period. Reported facility-wide 12-month rolling total emissions ending in June 2023 is 4.84 tons. Reported emissions indicate compliance with the permit limits.

Rule 287(2)(c)

Shingle Line 1, Shingle Line 2 and Edge Coater utilize the Rule 287(2)(c) exemption. Shingle 3 and Stainline are no longer present at the facility. Values in the spreadsheet indicate compliance with the 200 gallon per month minus water requirement of the exemption. It is noted that there are a few months where usage is very near the 200 gallons per month limit, and Lumbermen's should ensure accurate reporting and ongoing comparison of monthly usage to the limit.

Opt-out PTI No. 173-17

This permit limits each individual HAP to 8.9 tons per 12-month rolling time period. The highest reported HAP is ethylene glycol at 0.56 tons for the 12-month rolling time period ending in June 2023. Aggregate HAP are limited to 22.4 tons per 12-month rolling time period. The total reported HAP emissions for the 12-month time period ending in June 2023 are 0.58 tons. Values in the spreadsheet indicate compliance with the permit requirements, including the gallons and pounds of each HAP containing material utilized on a per line basis.

SUMMARY

Lumbermen's Finishing Division was in compliance at the time of the inspection.

NAME April Lazzaro

DATE 07/27/2023

SUPERVISOR HH