

P0808

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

FY2017 CMS Sched Insp

P080841109

FACILITY: Rosati Specialties		SRN / ID: P0808
LOCATION: 24200 Capital Blvd., CLINTON TWP		DISTRICT: Southeast Michigan
CITY: CLINTON TWP		COUNTY: MACOMB
CONTACT:		ACTIVITY DATE: 08/10/2017
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled CMS FY 2017 inspection of Rosati Specialties, LLC ("Rosati")		
RESOLVED COMPLAINTS:		

P0808 - SAR - 2017 08 10

Rosati Specialties, LLC (P0808)  
24200 Capital Boulevard  
Clinton Township, Michigan, 48036-1335

RosatiSpecialties.com

702 BACT: Rule 336.1620 RACT VOC standard minimum (12.0 pounds of VOC per 1,000 square feet of coated natural finish plywood product on a daily basis). Rule 336.1702 BACT (8.0 pounds of VOC per 1,000 square feet of coated natural finish plywood product on a daily basis).

P0808: SRN covers wood coating operations in two buildings: 24200 Capital Boulevard (Building 1, 2006) and 24300 Capital Boulevard (Building 2, 2011).

Permit-to-Install (PTI): AQD issued PTI No. 38-17 (ROP [VOC] and HAP / MACT Synthetic Minor permit) dated May 19, 2017 (AQD-Permit staff: Daniel Schwanik & David Thomas), for predominantly wood parts surface coating (both roll-coat and spray-coat). The coating processes commenced operation prior to obtaining a permit in both the buildings: 24200 Capital Boulevard (Building 1, 2006) and 24300 Capital Boulevard (Building 2, 2011). Hence, Rosati operated an ROP and MACT 4Q Major Source without a federal Title V (RO) and Rule 336.1201 permits. PTI No. 38-17 allows emissions up to: 54 tpy VOC, 8.9 tpy single HAP and 22.4 tpy Aggregate HAPs.

Subject to (not a major source for HAPs only after Rosati obtained a Synthetic Minor Permit in May 2017 [not before May 28, 2003, first compliance date for new [construction after December 09, 1991] Major MACT source]; before that Rosati was deemed to be a Major Source for both VOC and MACT): Major Source NESHAP / MACT 4Q, 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products; Final Rule, Page 31746, Federal Register / Vol. 68, No. 102 / Wednesday, May 28, 2003 / Rules and Regulations / Final rule. EFFECTIVE DATE: May 28, 2003.

MACT 4Q applicability: A non-major or area HAP source, i.e., actual and potential annual emissions are less than 10 tons of any single HAP and less than 25 tons of all HAP combined, is not subject to the MACT 4Q standards. Major MACT sources are defined as those that emit or have the potential to emit at least 10 tons per year of any single HAP or 25 tons per year of any combination of HAP. Rosati obtained, on May 19, 2017 [not before May 28, 2003, first compliance date for new [construction after

**December 09, 1991] Major MACT source], a Synthetic Minor permit (PTI No. 38-17). A major HAP source is subject to NESHAP / MACT 4Q.** First compliance date: May 28, 2003, if initial startup is before May 28, 2003, for new source (commenced construction or reconstruction on or after December 09, 1991). For an existing (commenced construction or reconstruction before December 09, 1991) major source, three years after May 28, 2003.

**Once-in-Always-in [OIAI] Policy: According to May 16, 1995, EPA memorandum entitled “Potential to Emit for MACT Standards – Guidance on Timing Issues” from John Seitz, Director of OAQPS, Major Sources of HAPs on the “first compliance date” are required to comply permanently with the applicable MACT standard to ensure that maximum achievable reductions in toxic emissions are achieved and maintained. In other words, in order not to be a major source, the company should have obtained federally enforceable permit limiting its potential-to-emit (PTE) below major source threshold for HAPs before the first compliance date (timeliness). In addition, Clean Air Act (CAA), as amended, requires all major sources to obtain a Title V (RO) permit**

**Once-in-Always-in [OIAI] Policy Repeal: On January 3, 2007, US EPA has proposed (Page 69, Federal Register / Vol. 72, No. 1 / Wednesday, January 3, 2007 / Proposed Rules) to replace this policy (May 16, 1995, EPA memorandum entitled “Potential to Emit for MACT Standards – Guidance on Timing Issues” from John Seitz) so that a major MACT source may become an area source any time.**

**VN: AQD will issue Violation Notice (VN)**

On August 10, 2017, I conducted a level-2 **Scheduled CMS FY 2017 inspection** of Rosati Specialties, LLC (“Rosati”), a wood surface coating facility, located at 24200 Capital Boulevard (Building 1, since 2006) and 24300 Capital Boulevard (Building 2, since 2011), Clinton Township, Michigan, 48036-1335. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451; Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules; and PTI No. 38-17.

During the FY 2017 inspection, Mr. Don Rosati (Phone: 586-783-3866; Fax: 586-463-5624; Cell: 313-475-0737; E-mail: don@RosatiSpecialties), President and Owner, assisted me.

Founded in 2000, Rosati Specialties, LLC (“Rosati”) is an architectural and wood finishing (coating) company serving predominantly millwork finishing companies. Rosati specializes in *Flat Panel* finishing and *Architectural Wood* finishing:

1. Architectural grade door skins
2. Architectural flush and panel wood doors
3. Prefinished plywood of any thickness
4. Cross grain panels
5. Cabinet components
6. Drawer components
7. Custom stain matching, etc.

**PTI No. 38-17 (ROP [VOC] and HAP / MACT Synthetic Minor permit)**

Rosati installed and operated coating processes in two buildings (24200 Capital Boulevard [Building 1, 2006] and 24300 Capital Boulevard [Building 2, 2011]) prior to obtaining a permit-to-install. Hence, prior to obtaining PTI No. 38-17 (ROP [maximum allowable VOC: 54 tpy] and HAP [maximum allowable HAP:8.9 tpy single HAP and 22.4 tpy Aggregate HAPs] / MACT Synthetic Minor permit) dated May 19, 2017, Rosati was deemed to be major source for both ROP and HAP.

Rosati is located in Macomb County, which is in attainment for all NAAQS criterial pollutants. The permit consists of the following emission units (EU) and flexible groups (FG):

### EMISSION UNIT SUMMARY

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EU-Spray Booth	Manual (hand-held) spray booth to apply lacquer coating to wood parts, and to apply touch-up coating to wood parts which were coated in other lines. This booth is equipped with an exhaust filter to control particulate emissions from the spray coatings, and is located in Building #1 (24200 Capital Blvd).	FG-DGME
EU- Roll Coat	<p>A conveyorized flat wood panel roll coating operation consisting of one stain roll coat line and one ultraviolet (UV) roll coat line. All panels are processed through both lines.</p> <p>The stain roll coat line consists of a belt sander, two (2) stain roll coaters to coat each side of the panels, stain wiping brushes, and a jetted air infrared curing oven.</p> <p>The UV roll coat line consists of a series of two (2) belt sanders, four (4) roll coaters to apply UV basecoat and topcoat to both sides of the panels, and four (4) UV curing ovens which follow each individual roll coater.</p> <p>To control particulate emissions, there is one dust collector for the belt sander associated with the stain roll coater and one dust collector for the two (2) belt sanders associated with UV roll coater.</p> <p>This equipment is located in Building #1 (24200 Capital Blvd).</p>	FG-DGME
EU-RSL Boiler	0.5 MMBtu/hr natural gas-fired boiler to provide indirect heating for the oven associated with the stain roll coater located in Building #1 (24200 Capital Blvd).	NA
EU-Spray Line	Conveyorized miscellaneous wood parts coating line consisting of one belt sander, one spray booth machine, one flash-off curing oven, one jetted air infrared curing oven, and one UV oven. The spray booth is equipped with an exhaust filter to control particulate emissions from the spray coatings, and a shared dust collector controls the particulate emissions from the belt sander. This equipment is located in Building #2 (24300 Capital Blvd).	FG-Building2

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EU-Molding Line	Conveyorized miscellaneous wood parts coating line consisting of one brush sander and one spray booth machine. The spray booth is equipped with an exhaust filter to control particulate emissions from the spray coatings. A shared dust collector controls the particulate emissions from the brush sander. This equipment is located in Building #2 (24300 Capital Blvd).	FG-Building2, FG-DGME
EU-SL Boiler	0.5 MMBtu/hr natural gas-fired boiler to provide indirect heating for the ovens associated with EU-Spray Line located in Building #2 (24300 Capital Blvd).	NA

## FLEXIBLE GROUP SUMMARY

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-Building2	Two (2) conveyorized miscellaneous wood parts spray coating lines located in Building #2 (24300 Capital Blvd).	EU-Spray Line, EU-Molding Line
FG-DGME	Dipropylene glycol monobutyl ether (CAS No. 29911-28-2) emissions from the roll coat line and the two (2) spray coating lines.	EU-Roll Coat, EU-Spray Booth, EU-Molding Line
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	
The boilers (2: 0.50 MM BTU per hour heat input design capacity each) were included in this permit because the VOC project emissions are just over 50 tpy, which is greater than the VOC significance level of 40 tpy. Per Rule 278, the boilers cannot be exempt as they are part of a project with greater than significant emissions.		

Rosati operates wood products coating processes in two buildings (24200 Capital Boulevard [Building 1, 2006] and 24300 Capital Boulevard [Building 2, 2011]). In all, three dust collectors are present: two Torit Dust Collectors (one with 32 cartridge filters for UV RollCoat line and the other with 24 cartridge filters for stain line) outside Building 1 and one Torit Downflow Dust Collector (24 cartridge filters for Spray line) outside Building 2. The dust collectors are for predominantly saw dust particulate emissions from sanders. Each dust collector is equipped with two 55-gallon drums as ~~hopper~~ for collected dust. In each dust collector, a pulse-jet air system is present for cleaning filters.

### Building 1, 24200 Capital Boulevard (started coating in 2006)

Three sanders and two dust collectors are present in Building 1; one dust collector for each line. In building 1 two lines are present: one stain line and one UV line (EU-RollCoat for two lines).

### Building 1 Stain line (EU-RollCoat – first line of two lines).

Raw wood is sanded using Heesmann sander. Raw wood is rinsed with water using Sorbini roll coater. Water-based stain is applied using Sorbini roll coater. Two brushes brush stain to spread stain and brushes are frequently cleaned with acetone. One stain oven (Cefla Finishing) cures stain. Heat for Cefla oven is provided by 0.5 MM BTU per hour boiler. After staining, wood product goes to UV line.

#### Building 1 UV line (EU-RollCoat – second line of two lines)

One Costa sander is present. Costa sander is used only if raw wood is fed not if wood is finished in stain line, where sanding is done already. Hence, Costa sander is idle most the times. Wood is roll-coated using 100% solid UV coating. Wood is cured in an oven using UV light. Coating is applied using two roll coaters that are in one Sorbini machine; wet-on-wet coating on same side. Wood is cured using UV light. Wood is sanded using Heesmann sander. Wood is roll coated with topcoat using Sorbini machine. Wood is cured in an UV oven. Wood is roll coated using Sorbini machine. Wood is cured using an UV oven.

#### Building 1 Spray booth (EU-SprayBooth)

One spray booth (12 ft. W \* 10 ft. D \* 10 ft. H) with a back-draft filters is present. The booth has low production. Only specialty items are coated in the booth. Typically, lacquers are sprayed in the booth. Also, water-based primer and basecoat are sprayed. In addition, solvent-based clearcoat is sprayed.

#### Building 2, 24300 Capital Boulevard (started coating in 2011)

All coatings used in Building 2 (EU-SprayLine and EU-MoldingLine) are water-based. One Torit Downflow Dust Collector serves this building. Building 2 mostly is used as warehouse. In Building 2, two lines are present: Spray Line and Molding Line.

#### Building 2 Spray Line (EU-SprayLine)

Wood is sanded using Heesmann sander. Dust is blown off manually if necessary using compressed air and blow-off area is equipped with its own Donaldson Torit filter (2 cartridges). Wood is coated using Venjakob automatic reciprocator spray machine consisting of 4 layers of exhaust filters for overspray particulate matter. One Venjakob flash off oven flashes off water. Wood is cured in Venjakob jetted air oven. 0.5 MM BTU per hour boiler provides heat needed. Wood is cured using UV oven. If needed, the other side of wood is process in the same line by flipping it.

#### Building 2 Molding Line (EU-MoldingLine)

Wood is sanded. Wood is coated using water-based coatings.

Neither Rosati representative (Mr. Don Rosati) nor its consultant read the permit as of August 10, 2017. No effort has been made to comply with the permit: recordkeeping, calculations, coating VOC & HAP analysis, etc. Hence, AQD will issue Violation Notice (VN) for non-compliance with the permit (PTI No. 38-17), Rules 201 (Permit-to-Install), 210 (ROP), NESHAP / MACT 4Q, etc.

#### **Conclusion**

AQD will issue Violation Notice for non-compliance with the permit and state and federal regulations.

NAME Blenahalt

DATE 8/17/2017

SUPERVISOR Jorge St