

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

N742050405

FACILITY: LELAND INTERNATIONAL		SRN / ID: N7420
LOCATION: 5695 EAGLE DRIVE SE, KENTWOOD		DISTRICT: Grand Rapids
CITY: KENTWOOD		COUNTY: KENT
CONTACT: Crow Rob , Operations Manager		ACTIVITY DATE: 09/17/2019
STAFF: David Morgan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

At 11:15 A.M. on September 17, 2019, Air Quality Division (AQD) staff Dave Morgan conducted an unannounced scheduled inspection of Leland International located at 5695 Eagle Drive in Kentwood. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations including Permit to Install No. 283-04. Accompanying AQD staff on the inspection was Bill Dykstra, the Production Manager and Rob Crow, Operations Manager.

FACILITY DESCRIPTION

Leland International is a small, institutional, wood furniture manufacturer. The facility consists of various wood sanding and cutting operations, a coating line and assembly operations. This facility is considered a true minor source.

COMPLIANCE EVALUATION

PTI No. 283-04 covers a wooden parts coating line consisting of a stain application spray booth, a sealer application spray booth, and a halogen light curing oven. Stain is applied in the first booth, and then parts are sprayed with sealer in the second booth. According to Mr. Dykstra, tinted varnishes are also sprayed as a base coat in the first booth. Parts are lightly sanded between coats and are put through the second booth for a final coat of sealer. Each booth uses Devilbiss, Compact HVLP spray guns in accordance with the permit. Filters were installed and looked well maintained. Parts are cured using banks of halogen light bulbs which raise the temperature to about 120 degrees F. It is noted that no equipment changes have been made at the facility since the last AQD inspection.

The company uses acetone for general cleanup and some stains have acetone in them as well. The company has a limit of 5.0 tons per year of acetone. In addition, the company uses lacquer thinner (#6040) for purge and cleanup. The company accounts for this usage in their VOC records.

The company is maintaining coating usage, VOC content, monthly and 12-month rolling for VOC and acetone emission calculations as required by Special Condition Nos. 1.8, 1.10, and 1.11. In addition the company maintains a record of HAP emissions which is not required by the permit.

The company primarily uses a variety of RepcoLite solvent based stains. Certified product data sheets (CPDS) were provided for stains, varnishes and sealers. According to records for the period from August 2018 and July 2019, there were two sealers (#AUS5800 and #AUS0846) that had a VOC content minus water and exempt solvents of 4.9 lbs/gallon which is greater than the permit limit of 4.60 lbs/gallon. In addition, there were four stains (#K869, #K2799, #1427, and #3141) that had a VOC content minus water and exempt solvents of at least 7.0 lbs/gallon which is greater than the permit limit of 6.70 lbs/gallon. Certified product data sheets for three other stains had non-compliant VOC content, however according to company records, they were not used from August 2018 to July 2019. A violation notice will be sent for VOC content exceedances.

From August 2018 to July 2019, company records show VOC emissions of 4.98 tons which is below the permit limit of 8.3 tons per 12-month rolling permit limit. Acetone emissions for the same time period were 0.51 tons which is below the 5.0 tons per 12-month rolling permit limit. It is noted that some VOC contents used in the mass VOC calculations are below those listed in the CPDS, however most VOC contents used in the calculations are either at or above listed contents in the CPDS. In addition, coating usage used in VOC mass calculations are over estimated as the company records an entire container used, once it is open, regardless if the container is fully used or not.

The company does have a small station used to apply a water-based adhesive which is exempt per Rule 287(2)(a).

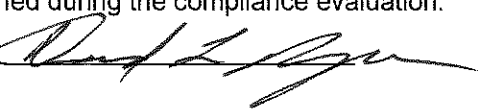
The company has two sanding stations which are exempt from permitting under Rule 285(2)(l)(vi) because they are vented into the general in-plant environment.

There is also a dust collector which controls sawdust from sawing and routing operations. This unit is also exempt under Rule 285(2)(l)(vi) because the baghouse exhausts to the in-plant environment.

SUMMARY

Leland International will be sent a violation notice for violations identified above. Attached to this report are records obtained during the compliance evaluation.

NAME



DATE

9/26/19

SUPERVISOR

