

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

N749947987

FACILITY: MOD INTERIORS, INCORPORATED		SRN / ID: N7499
LOCATION: 9301 MARINE CITY HWY, IRA TWP		DISTRICT: Southeast Michigan
CITY: IRA TWP		COUNTY: SAINT CLAIR
CONTACT: Donald Megie , President		ACTIVITY DATE: 02/15/2019
STAFF: Rem Pinga	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced Level 2 Target Inspection		
RESOLVED COMPLAINTS:		

On 2/15/2019, I conducted a level 2 unannounced target inspection at Mod Interiors, Inc. located at 9301 Marine City Highway, Ira Township, Michigan 48023. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the administrative rules, and Permit to Install No. 80-15. During the pre-inspection meeting, I met Mr. Donald Megie, President and facility contact person. I, initially, showed my credentials (ID Badge) and stated the purpose of my visit. Mr. Philip McKinney, in charge of coating operations, attended the pre-inspection meeting and also accompanied me during the walk-through inspection.

Per Mr. Megie, the facility's business is still architectural millwork. The company obtains contracts to build specialty interior cabinets, lockers, tables, etc. for customers such as schools, offices, etc. For some products such as metal cabinets/tables, the metal frames are built outside of the company and brought over to the facility to install the internally coated wood/laminate sidings, tops, etc. and assembled to finished product. The facility conducts woodworking operations such as cutting, sawing, grinding, sanding, etc.; painting/gluing processes; and assembly. In the past, the facility operated the coating/gluing processes under AQD Rule 287 exemptions from obtaining a Permit to Install per the requirements of AQD Rule 201. However, I found the facility non-compliant with AQD Rule 201 during an inspection conducted in March 2015. Subsequently, the facility obtained Permit to Install (PTI) No. 80-15.

PTI No. 80-15 was issued to Mod Interiors, Inc. for wood coating and adhesive application processes. This permit was also issued as a synthetic minor permit to opt the facility out of the Clean Air Act of 1990, Title V, Renewable Operating Permit (ROP) requirements. This stationary source is not considered a major source of Hazardous Air Pollutant (HAP) emissions because the company has agreed to accept facility-wide single HAP and combined HAP emission restrictions in PTI No. 80-15, supported by monthly 12-month rolling total/s recordkeeping requirements, to demonstrate continued compliance as a HAP minor facility. The facility is restricted to a potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112 to less than 9.0 tons per year and a potential to emit of all HAPs combined (aggregate HAPs) to less than 22.5 tons per year.

During the walk-through inspection, I observed a total of 3 spray coating booths. The first booth is a fully enclosed spray booth. Per PTI No. 80-15, special condition FGWOOD (IV.2), I observed HVLP applicator inside the booth. Per PTI No. 80-15, special condition FGWOOD (IV.1), I observed filters in place and appeared to be operating properly as there were no gaps in between each panel filter. The second spray booth is also fully enclosed but small in size and elevated, i.e. almost like a coating machine. Per Mr. McKinney, this booth is used for staining moldings. I also observed filters in place. The last spray booth is smaller than the first booth and not fully enclosed. I observed filters in place for the third booth and no gaps in between filters. I also observed the glue application equipment that is capable of applying glue into wood/laminate panels continuously. During inspection, all of the coating/gluing application processes were not in use. Per PTI No. 80-15, special condition FGWOOD (III.1 & 3), I observed all coating containers covered during inspection.

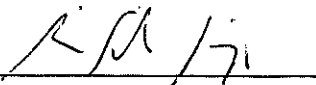
I observed equipment and processes for wood/laminate cutting, sanding, turning, drilling, etc. These processes have particulate control hood and ductwork system that discharge to an internally exhausted bag filter system, thus exempt from permit to install requirements per AQD Rule 285(I)(vi). The rest of the facility are for assembly and finishing of the product.

During the post inspection meeting, I requested to look at recordkeeping requirements to show compliance with PTI No. 80-15, special condition FGWOOD (I.1, I.2, I.3) and FGFACILITY (I.1, I.2, I.3). The records were in a spreadsheet that I had a difficult time to understand. I requested to have the spreadsheet email to me so I can spend more time at the office to analyze the data. I also requested for copies of Safety Data Sheets (SDS) for coatings/glue used in FY2018.

During my records review process, I found out that the spreadsheet contained daily coating/glue usage data but deficient in the monthly and 12-month rolling total VOC + Acetone emissions, individual and combined HAP/s emissions. I informed Mr. Donald Megie that I will be sending the company a Violation Notice for improper recordkeeping and not complying with PTI No. 80-15 recordkeeping requirements. In addition, I provided contact information of DEQ Training and Outreach staff, Ms. Jenifer Dixon, as potential resource person to help the company obtain assistance on how to comply with the recordkeeping requirements.

A Violation Notice will be sent to the facility.

NAME



DATE

3/5/2019

SUPERVISOR

