

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

P005955030

FACILITY: Silver Street Inc		SRN / ID: P0059
LOCATION: 892 Industrial Park Dr, SHELBY		DISTRICT: Grand Rapids
CITY: SHELBY		COUNTY: OCEANA
CONTACT: Randy Seaver , President		ACTIVITY DATE: 08/12/2020
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled, announced, compliance inspection.		
RESOLVED COMPLAINTS:		

INTRODUCTION

On Wednesday, August 12, 2020, an announced, scheduled inspection of Silver Street Inc. was conducted by inspector Scott Evans (SE). Silver Street Inc. is currently under the coverage of opt-out Permit to Install (PTI) No. 136-12. This inspection was conducted to evaluate compliance with this PTI. In addition to the visual inspection, a review of applicable records was conducted remotely. Per recent Air Quality Division field work guidance, SE contacted representative Randy Seaver (RS) on August 11, 2020 to ensure proper staff would be onsite during the inspection as well as to prepare for any Covid-19 related entry procedures.

Silver Street Inc. is a woodworking furniture manufacturing plant. There are two buildings that both house various processes as well as large-scale storage for staging completed furniture prior to shipment. The facility has multiple pieces of large woodworking equipment on site such as sanders, planers, and adhesive applicators.

During the approach to the facility, no signs of visible emissions or odors were found at the facility. SE entered the facility grounds at approximately 9:45 am and was greeted by facility representative Randy Seaver (RS). Proper facemasks and PPE were donned in accordance with safety precautions necessary to avoid spread of the COVID-19 Pandemic. After a brief discussion of the goals of the visit the inspection began in the northern building and concluded in the southern building.

PTI 136-12

PTI 136-12 covers one emission unit (EU-FLATLINE1) and one flexible group (FGFACILITY).

EU-FLATLINE1

This emission unit is a wood furniture coating line that uses a flatline twin spray machine with eight spray nozzles and a natural gas fired flash oven. Upon visual inspection the unit appeared to be functioning properly with clean filters properly installed to capture any excess from hand-held HVLP guns. As outlined in PTI 136-12, it could be seen that captured waste materials were properly stored in lidded containers in a separate, enclosed room and that spent filters were being properly disposed of. During the inspection, one container was connected to a distilling machine, which is used to reclaim some of the wasted material. It could also be seen that the machine was connected to the two stacks as described in the permit. The stacks were not measured but appeared to meet the specifications of the permit.

This emission unit is subject to two emission limits based on a 12-month rolling time period:

- 25.0 tons per year (tpy) Volatile Organic Compounds (VOCs)
- 2277 lbs/yr Formaldehyde

This emission unit is also subject to three material limits:

- 3.3 lbs VOCs / gal sealers
- 2.2 lbs VOCs / gal stains
- 5.0 lbs VOCs / gal topcoats

Compliance with these established limits was evaluated through review of records for the period of June 2019 through July 2020 provided by the facility. In accordance with the PTI, these records were kept utilizing manufacturer data to determine VOC and HAP content for emission factors. Compliance evaluations resulted in the following determinations:

Limit 25.0 tpy VOCs

- o Highest individual month: 0.9979 tons in June 2020
- o Annual total: 11.71 tons in December 2019.
- o In compliance

- Limit 2277 lbs/yr Formaldehyde
 - o All monthly totals below 1 lb.
 - o All 12-month-rolling totals below 1 lb.
 - o In Compliance

- Limit 3.3 lbs VOCs / gal sealers
 - o Sample sealer: 2.7 lbs / gal
 - o In Compliance

- Limit 2.2 lbs VOCs / gal stains
 - o Sample stain: 2.2 lbs / gal
 - o In Compliance

- Limit 5.0 lbs VOCs / gal topcoats
 - o Sample Topcoat: 3.7 lbs / gal
 - o In Compliance

EGFACILITY

Facility-wide there are two emission limits outlined in PTI 136-12 to opt the facility out of Title V permitting:

- . 9.0 tpy Individual HAPs
- . 22.5 tpy Aggregate HAPs

As is required by the permit, the facility maintains records of monthly and 12-month-rolling HAP usage and emissions based on material manufacturer data. At the request of the department, records were provided for the period of June 2019 through July 2020. Facility-wide limits were evaluated and found to be in compliance:

- Limit 9.0 tpy Individual HAPs
 - o Highest Month: 0.0047 tons Xylene in July 2019
 - o Highest Annual: 0.0191 tons Xylene in December 2019
 - o In Compliance

- Limit 22.5 tpy Aggregate HAPs
 - o Highest Month: 0.0082 tons in July 2019
 - o Highest Annual: 0.5550 tons in December 2019
 - o In Compliance

Exempt Equipment and Other Items

Within the facility are many pieces of large woodworking equipment such as sanders, planers, saw stations, and drilling stations that are connected to various baghouses and filters to capture particulate matter. These baghouses all vent to the internal facility environment and so are exempt under Rule 285(2)(i)(vi).

The facility has two adhesive coating process lines. One line is exempt by Rule 287(2)(a) since usage is less than 2 gallons per day and emissions are released to the facility interior environment. The other line is exempt under Rule 287(2)(i) since it is a hot melt process.

The facility has one hand-spray booth that is used for contact cement application. This booth utilizes a hand-spray gun and fabric filters. This booth is exempt under Rule 287(2)(a).

The facility has three additional hand-spray booths, though one of these booths is not currently operational and is used for storage at present times. All booths are equipped with hand-spray guns and fabric filters and are used for various coating and touch up operations. These booths are exempt under Rule 287(2)(c). Records demonstrating exemption status were included in the records provided to show material usage, with the highest monthly total reaching 88,625 gallons in July of 2019.

There are no boilers, generators, or cold cleaners located in either building at the facility.

Conclusions

At the conclusion of the inspection and records review it appears that the facility is compliant with all requirements established in PTI No. 136-12 and all other applicable air quality requirements.

NAME Scott Crann DATE 9/21/2020 SUPERVISOR MSH