

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

B251027398

FACILITY: CASE SYSTEMS INC		SRN / ID: B2510
LOCATION: 2700 JAMES SAVAGE RD, MIDLAND		DISTRICT: Saginaw Bay
CITY: MIDLAND		COUNTY: MIDLAND
CONTACT: William Carpenter , Manufacturing Manager		ACTIVITY DATE: 09/29/2014
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Facility Inspection		
RESOLVED COMPLAINTS:		

On September 29, 2014 Ben Witkopp of the Michigan Department of Environmental Quality - Air Quality Division (MDEQ-AQD) inspected Case Systems Inc. The inspection was conducted with Ed Osborn from Case. Ed is the Maintenance Supervisor for the facility.

There are actually two business operations occurring within the facility. In 2002 Case acquired BOSTONtec. BOSTONtec manufactures ergonomic and height adjustable workstations for use in laboratories, healthcare, assembly/packing operations, and tech/office spaces. The units can be custom designed and manufactured. As a compliment to the Case Systems product line, the BOSTONtec side uses metal for its products.

Flat sheet metal stock is brought into the facility and laser cutting is used to cut the sheets to desired sizes and shapes. Presses are then used to form the sheets into various shapes and welded as needed. The emissions from the metal fabrication equipment are exhausted internally. The operations are exempt from new source review permitting via rules 285 (i) and (l)(vi)(B).

After fabrication occurs, the parts are then routed through a phosphate washer system followed by a dry off oven. The washer / drying system is exempt from new source review permitting via rule 281(e).

After being prepared in the phosphate washer and dryer system, the parts are then powder coated and subsequently cured in a natural gas fired oven. The powder coating system is exempt from new source review permitting via rule 287(d). The parts are then assembled and prepared for shipping.

The east side of the facility houses the traditional Case Systems operations. Case customer base includes schools and laboratories. They manufacture work surfaces and casework for storage.

Case receives sheets of particle board. The sheets are cut to desired sizes and then receive laminated surfaces as desired by the customers. Edging is added and final actions include any desired tooling and hardware prior to assembly, packing, and shipping.

The various wood working operations have their exhaust routed to two baghouses located outside on the south side of the facility. The woodworking operations are exempt from new source review permitting via rule 285(l) (vi) B and C. The baghouses vent outside in the summer and back inside the facility during winter to aid in heating cost savings. Case has spare bags on site, performs regularly scheduled checks of the bags, and also checks the internal equipment. Dust that is captured is conveyed to a storage silo. Ed said the material is hauled off by people using it for horse bedding.

The facility has two lamination areas. A hot press is used on one while the other does not. The hot press uses Wilsonart 3131 while the cold press uses Wilsonart 3100. Countertops are processed on the hot press.

Spray operations are also present but are used to a far less extent than the laminators. Filters were in place and again Wilsonart adhesive is used.

On the east side of the facility there are two natural gas fired boilers which are 150,000 btu/hr each. Ed said they were installed in the 1950's. An incinerator from the 1950's is on site but it has been permanently disconnected. A wood fired boiler is also present and has permit 3-96. The unit is not used and has been disconnected. I told Ed it would be best to request the permit be voided.

Lastly, there is a parts cleaner found in the maintenance area on the north side of the facility. Operating instructions were not posted and the lid was up even though the unit was not being used at the time. I informed Ed of the rules concerning cold cleaners and their proper operation. At this point William Carpenter came over and introduced himself as the Director of Manufacturing. Staff inquired about records availability and he said he could provide them.

We then went to Mr. Carpenters office and he provided copies of the logs kept by the workers. The records had the date, quantity involved, etc. The records were kept by the various stations such as hot press, cold press, and spray. The hot and cold presses use 250 gallon totes and Mr. Carpenter said the totes are used until empty so any indication of additional usage means 250 gallons were used and a new 250 gallon tote was in place. Records for the cold press indicated typically four to five totes are used per month during the higher usage summer months. Winter months of February and March were down to 1 tote per month. The hot press usually uses about 1 tote per month. The spray operation uses less than 55 gallons per month.

Clearly the spray operation is exempt from new source review permitting via rule 287(c) based on usage records. Mr. Carpenter said the previous AQD inspector said they just had to keep usage records of all their usage and they were fine. Though that is true regarding the spray operation, the hot and cold press individual usage was above the 200 gallons per month allowed by Rule 287(c). MSDS were requested and provided.

Records for the lamination processes were reviewed. The MSDS indicated the VOC content to be low at less than 20 grams per liter. Since the usage volumes would definitely eliminate the use of rule 287(c) exemption staff then checked rule 290. 290 would allow 1,000 pounds of VOC per month uncontrolled. The maximum usage allowed, per line, is then up to 5,988 to 6,000 gallons depending on the conversion factors used. The preceding usage is valid for using the Wilsonart adhesives, as used and formulated, at the time of inspection. If the facility changes adhesives or the formulation changes then the allowed usages must be re-examined by the company as this is not a one time exercise. The highest usage occurs in the cold press. Of the records examined, the highest volume used in a single month was approximately 1,750 gallons. This usage is well below that allowed by rule 290.

Mr. Carpenter requested information on how to request voiding of the wood fired boiler as well as the cold cleaner rules. The requests were fulfilled during the afternoon via e-mail.

The facility is considered to be in compliance.

NAME

B. Vitroff

DATE

10-9-14

SUPERVISOR

C. Stone