

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B661472783

FACILITY: Holland Panel Products		SRN / ID: B6614
LOCATION: 615 E 40th St, HOLLAND		DISTRICT: Kalamazoo
CITY: HOLLAND		COUNTY: ALLEGAN
CONTACT: Chris Boyk , Project Engineer		ACTIVITY DATE: 02/13/2024
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On February 13, 2024 Air Quality Division (AQD) staff (Cody Yazzie, Mariah Scott, and Jared Edgerton) arrived at 615 East 40th Street, Holland Michigan at 10:30 AM to conduct an unannounced air quality inspection of Holland Panel Product (hereafter HPP) SRN (B6614). Staff made initial contact with the office receptionist and stated the purpose of the visit. Doug Zdrojewski, HPP, Plant Manager, is the site contact and arrived shortly thereafter and took staff to his office for further discussions. Chris Boyk, HPP, Chief Engineer, is the contact for records and environmental compliance.

HPP is a stationary source that as of the 2024 inspection had 7 staff members that operate on 1-ten hour shift 4 days a week. The facility uses fiberboard, hardboard, and particle board to manufacture store panels and fixtures that are often used by store chains and display designers. Woodworking equipment, including saws, routers, drills, and perforating stamp machines are all controlled by baghouses. These fabric filter control devices are located outside, but vent back inside the building area. The wood panels are finished on a conveyORIZED line. Water based coatings, ultraviolet (UV) coatings, and fillers are used in the process. Stations in the line may include, cleaning, roll coating, UV cure oven, sanding, IR curing, curtain coating, printing, and a gas fired curing oven.

The facility was previously a major source of Hazardous Air Pollutants (HAPs). December 21, 2021 the facility was issued an Opt-Out permit for HAPs. While the facility was designated a major source of HAPs HPP appeared to be subject to 40 Code of Federal Regulations (CFR) Part 63 Subpart QQQQ – Nation Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Wood Building Products. Since HPP obtained the Opt-Out Permit for HAPs the facility appears to be no longer subject to the NESHAP Regulation. 63.4681(b) of the NESHAP QQQQ indicates a facility is subject if a new, reconstructed, or existing affected source uses 4,170 liters per or more of coatings and is a major source of HAPs.

HPP was last inspected by the AQD on June 3, 2021 and appeared to be in Compliance at that time with MI-ROP-B6614-2017. Staff asked, and Mr. Zdrojewski stated that the facility does not have any boilers, emergency generators, or cold cleaners.

Mr. Zdrojewski gave staff a tour of the facility. Required personal protective equipment are steel toe boots and safety glasses. Staff observations and review of records provided during and following the inspection are summarized below:

EUPAINTLINE1:

This emission unit is a conveyORIZED process with numerous stations. The different stations include: two reverse roll coating (RRC), two ultraviolet cure ovens, sander, preheat oven, two denibber stations, curtain coater, direct roll coaters, base coat oven.

This emission unit has 12-month rolling VOC, Acetone, and Formaldehyde limits. These limits are 25.0 TPY, 3.3 TPY, and 24.1 lb/year respectively. Staff was provided with monthly records for these emissions limits for the time period of January 2022 through February 2024. VOC records showed that the highest calculated 12-month rolling emissions occurred during January 2022. In January 2022 it was calculated that 3.36 TPY of VOC emissions were emitted for the 12-month rolling time period. Acetone records showed the highest calculated 12-month rolling emissions occurred during November 2022. In November 2022 it was calculated that 2,295.09 lbs/year or 1.15 TPY of acetone emissions were emitted for the 12-month rolling time period. Formaldehyde records showed that the highest calculated 12-month rolling emissions occurred in July 2023. In July 2023 it was calculated that 4.46 lb/yr of formaldehyde were emitted for the 12-month rolling time period. These are all well below the permitted limit.

Special Condition II.1 is a material limit that limits the amount of VOC coated per 1,000 square ft of coated product from Class II finishes on hardboard panels. This record is required to be documented on a daily volume weighted average. For this record the facility is tracking daily volume average for each calendar day. From these record the largest daily volume average was recorded on April 29, 2022 and calculated to be 1.529 lbs VOC/1,000 sq. ft. This is the only date in which the facility appeared to exceed the daily volume weighted average limit. The facility does calculate to more significant figures than provided in the limit. The next highest daily volume weighted average occurred on April 25, 2022 and calculated to be 1.446 lbs VOC/1,000 sq ft. A majority of the daily volume weighted average appeared to range between 0.15 – 0.80 lbs VOC/1,000 sq ft.

While the facility did appear to exceed the 1.5 lb VOC/1,000 sq ft daily volume average limit for a single day during the review. The exceedance appears to be an isolated incident and minimal only 0.029 lbs VOC/1,000 sq ft over the limit. Records showed that a majority of the daily volume weighted averages range between 0.15 – 0.80 lbs VOC/1,000 sq ft and have consistently come down from the 2022 data. The exceedance does not appear to warrant a violation notice as it seems to be resolved and not an ongoing issue.

During the inspection Staff noted that VOC and HAP containing materials appeared to be handled in a manner to minimize the generation of fugitive emissions. Staff noted containers appeared to be covered at all times except when necessary for operations.

Special Condition V.1 requires that the facility to determine VOC content, water content, and density of any material as applied and as received using Reference Test Method 24. However, upon written approval by the AQD District Supervisor approve the facility to determine the VOC content from the manufacturer's formulation data. On January 13, 2022 the facility submitted the request to use manufacture's formulation data. In the request it mentioned that UV and water based coatings used at Holland Panel Products are utilized and approved to utilize the formulation data the Alpena and Coldwater Panel Processing facilities. The facility also states that EPA has discussed that water based coatings using method 24 have seen problems with getting imprecise VOC results. The facility file did not appear to have a approval letter on file. With the

Inspection report Staff intends to send out a approval letter for the use of manufacture's formulation data.

EUEDGECOAT:

EUEDGECOAT is a spray application coating unit that appears to operate under Exemption Rule 287(2)(c). This process is used to apply coatings to the edges of stacked panels. The facility is keeping monthly records for this operation. Staff reviewed Rule 287(2)(c) exemption records from January 2022 through January 2024. Records showed that the facility's largest monthly coating usage occurred in August 2022 in which the facility used roughly 2.98 gallons. This is well below the 200 gallon per month limit.

This emission unit is located in a separate coating bay. The bay has an exhaust fan that discharges through the wall at ground level that is covered with a particulate filter. The condition of the particulate filter was used but did not appear torn or ripped. The facility appears to be meeting the requirement of Rule 287(2)(c)

FGPARTICULATE:

FGPARTICULATE is a collection of woodworking units that are used to saw, machine, and perforate the panel boards. The West unit is a dedicated unit that controls the Slotwall Router. The East unit combines ductwork from the saws, a CNC machine, punch presses, and a few routers. Both units are equipped with a differential pressure gauge and have the exhaust sent back into the general in-plant environment.

During the inspection it was noted both of the magnehelic gauges were not operating properly and reading 0 inches of water. The baghouses exhaust back inside and there was no evidence of dust in the facility coming from the exhaust. Staff let Mr. Zdrojewski know that it is a permit requirement that these gauges be properly installed, maintained, and calibrated for the operation of FG-PARTICULATE. Staff indicated that if the facility could fix the gauges in a timely manner Staff would consider the issue resolved. A picture of the gauges working properly was sent to Staff on February 16, 2024. This issue appears to be resolved. If the issue with the facility not maintaining these pressure drop monitors continues in the future it may be appropriate to send a violation notice at that time.

MONCO LAMINATOR:

This unit is a lamination unit that has a pre applied adhesive hot melted on during the lamination process. The unit is equipped with a small internally vented baghouse. The baghouse is used to collect dust debris that come off in the shipping and handling. The emission unit appears to meet exemption Rules 287(2)(i) and Rule 285(2)(I)(vi)(B).

FGFACILITY:

The facility is maintaining records of HAP emissions. One of the primary HAP emissions from the facility is Formaldehyde. Overall aggregate and individual HAPs emission are low based on records. Staff was provided with Records from January 2022 through February 2024. The largest record Aggregate HAP emissions during this time period was 0.00227 TPY (4.54 lbs/year) which

occurred in July 2023. The Aggregate HAP emissions are well below both the 8.9 TPY individual HAP emission limit and the 22.4 TPY Aggregate HAP emission limit.

Conclusion:

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in compliance with PTI No. 114-21 or have resolved the pressure drop monitoring and daily VOC exceedance. Staff stated to Mr. Boyd that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 11:30 AM.-CJY

NAME Cody Yeggin

DATE 7/25/24

SUPERVISOR Marik