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DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N069837827

FACILITY: Kentwood Office Furniture - Lansing		SRN / ID: N0698
LOCATION: 2101 W WILLOW, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: INGHAM
CONTACT: Tom Reisner , Operations Manager		ACTIVITY DATE: 12/06/2016
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Self-initiated inspection of a facility which was last inspected by AQD in 2010 (that inspection was erroneously entered into MACES under the SRN for a different location, N8001).		
RESOLVED COMPLAINTS:		

On 12/6/2016, the Michigan Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted a self-initiated inspection of Kentwood Office Furniture - Lansing, at 2101 W. Willow Street, Lansing.

Facility contact:

Tom Reisner, Operations Manager; 517-492-7010; tomreisner@kentwoodoffice.com

Facility description:

This facility refurbishes office furniture and resells it. In addition, they sell new office furniture, and "as is" used furniture.

Emission units:

Emission unit*	Emission unit description	Exemption rule	Compliance status
Paint booth	Paint spray booth with particulate filters	Rule 287(c)	Compliance
Adhesive spray booth	Adhesive spray booth with particulate filters	Rule 287(c)	Compliance
Powder coating booth	Unused powder coating booth	Rule 287(d)	Not in use

*An *emission unit* is any part of a stationary source which emits or has the potential to emit an air contaminant.

Regulatory overview:

This facility is considered to be a true minor source, rather than a major source of air emissions. A *major source* has the potential to emit (PTE) of 100 tons per year (TPY) or more, of one of the criteria pollutants. *Criteria pollutants* are those for which a National Ambient Air Quality Standard exists, and include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns, and particulate matter smaller than 2.5 microns.

This facility is also considered a minor, or *area source*, for Hazardous Air Pollutants (HAPs), because it is not known to have a PTE of 10 TPY or more for a single HAP, nor to have a PTE of 25 TPY or more for combined HAPs.

Emission units at this facility are considered exempt. This includes a spray painting booth and an adhesive booth, considered exempt under Rule 287(c). A rule of thumb AQD has used for coating booths exempt under Rule 287(c) is that they each have a maximum PTE of 6 TPY of VOC, which would keep the facility below the major source threshold of 100 TPY of VOC. The facility also has an unused powder coating booth, which can be considered exempt under Rule 287(d).

Note: On 12/20/2016, two weeks after this inspection, the AQD exemption rules were revised. Rule 287(c) was replaced with Rule 287(2)(c), and Rule 287(d) was replaced with 287(2)(d). These emission units

were installed prior to the rule change, however, so they would still be subject to Rules 287(c) and (d).

Fee category:

This facility is not considered fee-subject, for the following reasons. Because it is not a major source for criteria pollutants, it is not classified as Category I. Additionally, because it is not a major source for Hazardous Air Pollutants (HAPs), and is not subject to federal New Source Performance Standards, it is not classified as Category II. Finally, because it is not subject to federal Maximum Achievable Control Technology standards, it is not classified as Category III.

This facility is not required to submit an annual air emissions report via the Michigan Air Emissions Reporting System (MAERS).

Location:

The facility is located in an area which is a mix of heavy industry and commercial residential properties. An apartment building is about 210 feet to the north of the factory, along with a restaurant, as measured by ArcGIS Explorer. The nearest houses are about 300 feet to the east of the factory building, and 300 feet to the south of it. To the immediate west of the facility are other industrial sites.

Recent history:

This facility was last inspected by AQD on 3/16/2010, however, that inspection report was entered into MACES under the incorrect State Registration Number (SRN) N8001, which is actually associated with the previous site this business operated out of (2110 S. Washington Avenue, Lansing). No instances of noncompliance were found during the 2010 inspection here. AQD has no record of complaints for Kentwood Office Furniture, at either the current or the previous sites.

Arrival:

Accompanying me on this inspection was Ms. Marina Ostaszewski, a Student Intern with the DEQ's Office of Environmental Assistance, for educational purposes. This was not an unannounced inspection, as AQD guidance for bringing interns in the field is to plan the inspection in advance. This ensures that an appropriate number of personnel are available at the facility to safely escort DEQ staff through the industrial site.

At 9:24 AM, no odors or visible emissions from the plant were detected as we drove past it, on West Willow Street. Weather conditions were overcast, and 37 degrees F, with winds out of the east southeast at 0-5 miles per hour.

We met with Mr. Tom Reisner, Operations Manager. He advised us that they are still using the same water-based paint and the same water-based glue that they were using in 2010. He provided safety data sheets (SDS) for the paint and glue (attached for reference).

I inquired if there were any boilers at this facility, to check applicability with the federal area source boiler regulation, 40 CFR Part 63, Subpart JJJJJJ, *National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources*. I was informed that they have an out of service boiler, which is not used, and that the building is heated with forced air from natural gas-fired heaters. I inquired as to any hot water heaters at the plant. It is my understanding that they have a hot water heater with a capacity of about 50 gallons, for their restrooms. Hot water heaters with a capacity of no more than 120 gallons are specifically exempted by Subpart JJJJJJ, so this facility does not appear to be subject to this area source regulation.

Inspection:

Mr. Reisner explained that they are not doing as much remanufacturing of furniture, right now. When the economy is stronger, people tend to buy more new furniture, like now, we were advised, and when

the economy is weaker, people tend to buy refurbished used furniture, to save money. It is my understanding that the most popular of their refurbished items tends to be cubicle wall panels.

Paint booth; Rule 287(c):

The paint booth was not running, at this time. It is my understanding that a typical operating schedule would be 20 hours or less per week, 1 shift per day. Some remanufactured or refurbished steel, aluminum, and/or plastic parts were on a nearby drying rack. Mr. Reisner indicated that these were trim parts for cubicle wall panels.

Mr. Reisner showed us the paint booth, which is equipped with a chain on edge conveyor, to move parts. He turned on the exhaust fan, and chain conveyor, to demonstrate that they were in operating condition. The paint booth had at least 4 layers of particulate filters in place, for the filtration system on the back wall. The first filter layer was of a very coarse material, followed by successively finer layers. The final layer was a sponge-like material. I inquired as to how often the filters were changed, and was informed this is done from 6-12 times per year. The walls of the paint booth itself were covered with a sprayed on protective coating, which, we were informed, protects it against paint buildup, and is removed and replaced about 3 times per year.

Mr. Reisner advised that they use less than 50 gallons of paint and adhesive combined, per month. He said that they use maybe slightly over 200 gallons of paint, per year. They use strictly water-based paint, we were informed, so I advised him that they can subtract the water when they are checking compliance with Rule 287(c). Recordkeeping for the paint booth is discussed later in this activity report, under the section titled "Recordkeeping." As previously mentioned in this report, he provided AQD with a copy of their SDS for their coating materials (please see attached).

They have a natural gas-fired oven for curing paint, we were shown, but it is not hooked up. Mr. Reisner explained that their current paint does not require baking in order to cure.

Powder coating booth; Rule 287(d):

Near the spray painting booth there was a powder coating booth, which has never been used, Mr. Reisner informed us. We were advised that they have Nordson canister style filters which would be used, if the powder coating booth is operated.

Adhesive coating booth; Rule 287(c):

The adhesive coating booth was not running, at this time. The fan was turned on, to show that it is in working condition, and the particulate filters appeared to be in good condition. We were informed that the filters are changed about once per month. The side walls of the booth were lined with large cardboard panels, which, we were told, protect the walls from adhesive overspray. When the cardboard is changed out, it is baled and recycled, we were informed. It is my understanding that the operating schedule for the booth is typically about 15-20 hours per week.

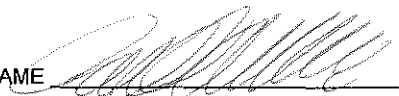
As previously mentioned in this report, Mr. Reisner provided a copy of their SDS sheets for their coating materials (please see attached).

Recordkeeping:

On 12/12/2016, Mr. Reisner e-mailed copies of coating purchase records for 12 months, for water-based paint, and for glue; please see attached. By my count, they purchased 67 gallons of paint and 35 gallons of adhesive during this 12-month period. Even if all these raw materials were used in the course of a single month, they would still fall below the 200 gallon maximum allowable under Rule 287(c) for each of the two coating lines (the paint booth and the adhesive booth). Plus, the water content in their water-based coatings can be subtracted from the monthly throughput.

Conclusion:

No instances of noncompliance were observed. We left the facility at 10:19 AM. Neither odors nor visible emissions were detectable, from the facility parking lot.

NAME 

DATE 6/8/2017

SUPERVISOR B. M.