

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

N748529959

FACILITY: VOGUE FURNITURE		SRN / ID: N7485
LOCATION: 2720 W. 14 MILE RD., ROYAL OAK		DISTRICT: Southeast Michigan
CITY: ROYAL OAK		COUNTY: OAKLAND
CONTACT: Jim Reilly, Shop Foreman		ACTIVITY DATE: 06/04/2015
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On Thursday, June 4, 2015, I conducted a targeted inspection at Vogue Furniture located at 2720 W. Fourteen Mile Road, Royal Oak, Michigan. Vogue Furniture and Perspectives share same address, occupy the same building and share the manufacturing shop. The purpose of the inspection was to verify facility's compliance with requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994 and requirements of the permit to install (PTI) No. 42-06 (HAP opt out permit) and 309-05 (General Permit for Coating Processes).

I arrived at the facility about 9:00 AM. I met Mr. James Reilly, Shop Foreman and Mr. Richard Erikson, Finish Product Foreman. I introduced myself and stated the purpose of my visit. I provided them the MDEQ Brochure "ENVIRONMENTAL INSPECTIONS: Rights and Responsibilities".

During the pre-inspection meeting, Mr. Reilly explained to me the business and manufacturing operations at this facility. They haven't had any change in the operations. Vogue Furniture manufactures custom furniture, wall units, and entertainment units. The process involves wood cutting, side gluing, staining, sealer application, top coating, etc. The coating process includes staining, sanding, base coat and clear coat. The facility does not perform any lamination. The facility has two dust collector baghouses to collect the dust from the table saw operations, CNC operations, saws, sanders, joiner (smoothing the edges) and planer operations (thinning). The exhausts from the baghouses are vented inside of the facility. This processes are exempt from Permit To Install (Rule 201) requirements pursuant to Rule 285(l)(vi)(C). The saw dust materials collected from these baghouses are emptied to waste dumpster.

Mr. Reily told me that the stains applied are all water based. They use about 20 solvent based coatings and 8 water based coatings. The waste solvents/coating from the coating operations are kept in closed containers and store the containers closed cabinets until picked up. Vogue generates about two 55 gallons waste every 4-6 weeks. They use plastic cabinet to store their waste solvent barrels. Cabinet can hold up to 4 containers.

Next we inspected the spray booths. The facility has three booths. The filters for all booths looked relatively clean and properly placed. The operators in the booths told us that the intake air filters are replaced every 2 weeks and the exhaust air filters are replaced every week.

Vogue is submitting emissions reports to AQD annually. The facility is keeping monthly records of coating usage, VOC content of the coatings, total VOC emissions, HAP content and total HAP emissions. On June 29, 2015, copies of the coating usages from Jan to May were emailed to AQD. The coating usage and emission calculations for 2014 was submitted along with 2014 MAERS submittal. The 2014 MAERS shows that the facility used about 669 gallons of coating and the VOC emissions were reported as 2799 pounds. The total HAP emissions were 1309 pounds. From the VOC emissions and HAP emission calculations, the facility appears to be in compliance with the VOC and HAP emission limits.

#### General Permit for Coating Process (PTI No. 309-05)

Facility appears to be in compliance with the monthly and annual VOC emissions for each coating line and all coating lines combined. In stead of calculating emission rates for each coating line the facility calculates emission rates based on the facility usage. Because of low emissions in comparison to the

allowed emissions, this record keeping is acceptable. Each operator takes out coating from the storage cabinet and mark the amount as used. Mr. Reilly collects the usage sheets at the end of the month and enters it in the computer. Facility keeps MSDS for al the coatings. The HAP and VOC emissions based on coating usage for 2015 Jan-May appears to be in compliance with the allowed emissions limits.

Opt Out Permit for HAPs (PTI No. 42-06)

The based on the 2014 VOC emissions, the HAP emissions appears to be less than 9.0 TPY for individual HAP and less than 22.5 TPY for aggregate HAPs.

Conclusion: Based on the inspection and records review (attached), the facility appears to be in compliance with the permit requirements.

NAME S. Kallumkal

DATE 7/15/2015

SUPERVISOR

CJE