

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

N748552581

<b>FACILITY:</b> VOGUE FURNITURE		<b>SRN / ID:</b> N7485
<b>LOCATION:</b> 2720 W. 14 MILE RD., ROYAL OAK		<b>DISTRICT:</b> Warren
<b>CITY:</b> ROYAL OAK		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b>		<b>ACTIVITY DATE:</b> 02/11/2020
<b>STAFF:</b> Joe Forth	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> On-site inspection.		
<b>RESOLVED COMPLAINTS:</b>		

On February 11, 2020, AQD staff Joseph Forth conducted a targeted inspection at Vogue Furniture located at 2720 W. Fourteen Mile Road, Royal Oak, Michigan. Vogue Furniture and another facility, Perspectives in Laminate, share same address, occupy the same building and share the manufacturing shop. The purpose of the inspection was to determine the Vogue's compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended, EGLE-AQD Air Pollution Rules, and requirements of the permit to install (PTI) Nos. 42-06 and 309-05.

I arrived at the facility about 2:00 PM. I met with Dave Golpe, Finish Department, and Sue Bartelt, Office Manager. I introduced myself, presented my credentials, and stated the purpose of my visit.

Vogue Furniture manufactures custom furniture, wall units, and entertainment units. Mr. Golpe explained to me the manufacturing operations at this facility. They haven't had any change in the operations. 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 wood working processes. The exhausts from the baghouses are vented inside of the facility. These processes are exempt from Permit to Install (Rule 201) requirements pursuant to Rule 285(2)(l)(vi)(C). The saw dust materials collected from these baghouses are emptied to waste dumpster. The facility keeps waste coatings and solvents in sealed barrels in special waste holding sheds. Mr. Golpe provided a manifest from the waste disposal company that processes their waste (See Attachment A).

Ms. Bartelt provided the required VOC and HAPs emissions records for the facility.

Vogue Furniture operates from 7 am to 5 pm, Monday through Friday and employs 47 workers, 9 of which work in the finishing department.

#### Compliance

VOC and HAPs emissions documents were provided electronically and can be found in:

S:\Air Quality Division\STAFF\Joe Forth\N7485 Vogue Furniture FY20 Inspection

PTI No. 42-06

#### FGFACILITY

2.1a Individual HAP emission limit of 9.0 tons per year. No individual HAP material exceeded the 9.0 tons per year limit.

2.1b Aggregate facility HAPs emission limit of 22.5 tons per year. The total aggregate HAPs emissions for 2019 was 1.31 tons.

2.2 The facility uses manufacturer formulation data to calculate HAPs emissions.

2.3 The permittee completes all calculations for each month by the 15<sup>th</sup> day of the following month.

2.4 The permittee is keeping the following records on a monthly basis:

- a. Gallons of each HAP containing material used.
- b. The facility does not reclaim any HAP containing materials.
- c. HAP content (pounds per gallon) of each HAP containing material.
- d. Individual and aggregate HAP emission calculations determining the monthly emission

rate of each in tons per calendar month.

- e. Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12 month rolling time period.

PTI No. 309-05 – general coating permit, the conditions referencing oxidizers do not apply to Vogue Furniture as they utilize dry filters for the coating booths.

#### FG-COATING

I.1 Monthly VOC emission limit of 2000 pounders per calendar month. No month in 2019 exceeded 500 pounds of VOC in a month.

I.2 12-month rolling time period limit of 10 tons of VOC. VOC emissions for January 2019 through December 2019 totaled at 2.715 tons.

III.1 The permittee captures and stores all waste coatings and solvents in closed containers and contracts a waste disposal company to remove it from the facility. (See Attachment A)

IV.1 The spray applicators used in all the spray booths are High volume-low pressure (HVLP).

IV.2 The permittee uses dry filters as a control device for the coating booths. The booths all appeared to be properly outfitted with dry filters at the time of inspection. Mr. Golpe said that usually the filters are replaced at least once a month, more frequently depending on workload.

V.1 The permittee has received AQD approval to use manufacturer formulation to determine VOC content of materials used in FG-COATING.

VI.3 The permittee keeps and provided the following information on a monthly basis for FG-COATING:

- a. Purchase orders for all coatings, reducers, and purge/clean-up solvents.
- b. VOC content (lbs/gal) of each coating, reducer, and solvents.
- c. Gallons of each material used in FG-COATING.
- d. VOC monthly emission calculations.
- e. 12-month rolling time period VOC emission calculations.

VI.4 Mr. Golpe showed me the SDSs for all materials utilized in FG-COATING. Copies were not requested at this time.

VII.1 The exhausts for FG-COATING appeared to be unobstructed and discharging vertically.

IX.1 The facility has not made any replacements or modifications to any portion of FG-COATING.

#### FG-SOURCE

I.1 A source-wide VOC limit of 30 tons per year, based on 12-month rolling time period. The source wide VOC emissions are equal to the FG-COATING VOC emissions, 2.715 tons in 2019.

VI.1 The permittee keeps and provided 12-month rolling time period VOC emission calculations.

#### Conclusion

The permittee appears to be in compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended, MDEQ-AQD Air Pollution Rules, and requirements of the permit to install (PTI) Nos. 42-06 and 309-05.

NAME Joseph M. Kutt

DATE 9-28-20

SUPERVISOR Sebastian Kallumkal