

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

N749928842

FACILITY: MOD INTERIORS, INCORPORATED		SRN / ID: N7499
LOCATION: 9301 MARINE CITY HWY, IRA TWP		DISTRICT: Southeast Michigan
CITY: IRA TWP		COUNTY: SAINT CLAIR
CONTACT: Donald Megie , President		ACTIVITY DATE: 03/16/2015
STAFF: Rem Pinga	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Major
SUBJECT: Unannounced Level 2 Target Inspection		
RESOLVED COMPLAINTS:		

On 3/16/2015, AQD staff Kerry Kelly and I conducted a level 2 unannounced target inspection at Mod Interiors, Inc. located at 9301 Marine City Highway, Ira Township, Michigan 48023. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), and the administrative rules. During the pre-inspection meeting, Mr. Donald Megie, President and facility contact person, met Ms. Kelly and I at the conference room. Ms. Kelly and I initially showed our credentials (ID Badge), stated the purpose of our visit, and gave a copy of the pamphlet "Environmental Inspections: Rights and Responsibilities" to Mr. Megie.

Per Mr. Megie, the facility's business is architectural millwork. I observed cabinets being built from either wood or plastic laminate materials (formica). During the walk through inspection, we observed a total of 3 spray coating booths. The first booth is fully enclosed with doors that you can walk in. We observed filters in place and appeared to be operating properly as there were no gaps in between each panel filter. The second spray booth is also fully enclosed but small in size and elevated, i.e. almost like a coating machine. This booth is used for staining moldings. I also observed filters in place. The last spray booth is an in between size from the first 2 and not fully enclosed. I observed filters in place for the third booth. I observed staining being conducted outside and adjacent to the second and the third booths which are located perpendicular to each other. The area around this rectangular shape section of the second and the third booths are fully enclosed with a plastic curtain to isolate the area. We saw some wood panels being stained on some of the tables inside this enclosed section. Gluing of the plastic laminate is also being conducted here. Mr. Megie mentioned that there are no permit requirements for these processes because the facility does not coat more than 200 gallons of coating. These requirements are contained in AQD Administrative Rule R 336.1287(c) for permit to install exemption. However, the person in charge with the coating processes failed to keep monthly coating use records to show compliance with Rule 287(c).

As we continue with the walk through, we observed equipment and processes for wood/laminate cutting, sanding, turning, drilling, etc. These processes have particulate control hood and ductwork system that discharge to an internally exhausted bag filter system, thus exempt from permit to install requirements per AQD Rule 285(l)(vi). We also observed a glue application equipment capable of gluing wood/laminate panels continuously. Mr. Megie mentioned that application is being conducted manually because the equipment is out of order. He also mentioned that the other glue application process occurs at the tables inside the enclosed area by the second and third paint coating booths. The rest of the facility are for assembly and finishing of the product.

During the post inspection meeting, I explained to Mr. Megie that I will be sending the facility

a Violation Notice for not meeting the Rule 287(c) requirements for a permit to install exemption for the paint coating booths and Rule 287(a) for the adhesive coating processes, thus noncompliant with AQD Rule 201. I also explained to Mr. Megie that the facility does not have a permit to install with Federally enforceable conditions to restrict the potential to emit of any single Hazardous Air Pollutant (HAP) or combined HAPs to 10 and 25 tons per year or less respectively and opt the facility out of the Renewable Operating Permit (ROP) program as mandated by the Title V of the Clean Air Act of 1990 and the AQD Administrative Rule R 336.1210 pursuant to R 336.1211. Therefore, the facility is currently noncompliant with AQD Rule 210 unless an ROP or a permit to install that also serves as ROP Optout Permit is obtained.

A Violation Notice will be sent to the facility.

NAME *Jill H.* DATE *3/31/2015* SUPERVISOR *CJE*