

U-63-17-05135

FY 2017 Insp -

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

U63170513540853

FACILITY: Maverick Building Systems, Inc.		SRN / ID: U631705135
LOCATION: 3190 Walled Lake Court, Commerce Twp.		DISTRICT: Southeast Michigan
CITY: Commerce Twp.		COUNTY: OAKLAND
CONTACT:		ACTIVITY DATE: 06/27/2017
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: <u> </u>
SUBJECT: FY 2017 inspection of Maverick Building Systems, Inc.		
RESOLVED COMPLAINTS:		

N 7827 - SAR - 2017 06 27

C A Hull Co., Inc. (N7827)
Maverick Building Systems, Inc. (U-63-17- 05135)
Commerce Twp., Michigan 48390

Move (about March 2014): Maverick Building Systems, Inc. moved from 8225 Goldie St., City: Walled Lake, P.O.: Commerce Twp., Michigan 48390-4109 (N7827) to 3190 Walled Lake Court, Commerce Twp., Michigan 48390-1745 (U-63-17- 05135)

SRN N7827 reassign: Maverick Building Systems, Inc. → C A Hull, Inc. Maverick sold the building and yard as a result of 2010 construction industry great recession. Consequently, about March 2014, Maverick, moved out.

VNs: AQD issued Violation Notices dated May 7, 2008 (Rules 336-1201 & 336-1910) and June 21, 2007 (Rule 336-1910): Pursuant to Rule 336.1285(I), the Wood Cutting Process is exempt from Rule 336.1201 (Permit-to-Install) if the particulate emissions are controlled by an appropriately designed and operated air pollution control device (APCD) such as cyclone followed fabric filter collector (10 bags of size 6 feet tall & 2 feet diameter). If the APCD is not operated properly, the process is not exempt from Rule 201. Based upon AQD's observations, Maverick consistently operated the Wood Cutting Process while APCD was deliberately turned off in spite of being reminded repeatedly that a proper operation of an existing APCD was required by applicable state and federal clean air laws and regulations. Of ten bags, only five are moved to new location (3190 Walled Lake Court). All violations for Maverick occurred at 8225 Goldie St.

On June 27 (Maverick), and July 25 2017 (C A Hull, Inc.), I conducted a level 2 self-initiated **FY 2017 inspections** of Maverick Building Systems, Inc. ("Maverick") and C A Hull, Inc. located at two locations listed. The inspections were conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451 and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

C A Hull Co., Inc. (N7827)

During the inspection, Ms. Tiffany Ribble (Phone: NA; Cell: 810-217-9355; Fax: NA; E-mail: tRibble@caHull.com), Shop Forman, Mr. Josh Newsome (Phone: NA; Cell: 810-459-4380; Fax: NA; E-mail: jNewsome@caHull.com), Shop Forman, and Randy Boni (Cell: 313-790-0443), Wood Shop Forman, assisted me.

Mineral Spirits NE (Stoddard solvent) or aliphatic hydrocarbons CAS 64742-47-8 (Safety-Kleen 800-669-5740)

100% VOC solvent. Flash Point (FP) = 105 °F TCC (Tag Closed Cup). Auto Ignition = 410 °F. Boiling Point (BP) = 310 °F @ 760 mm Hg. Vapor Pressure (VP) = 0.6 mm Hg at 68 °F = 1 mm Hg at 100 °F. Specific Gravity (SG, Water = 1.0) = 0.79. Density (ρ) @ 68 °F = 6.59 lbs / gallon (0.790 kg /L). Flammability range = 0.7 %v (LEL) – 5%v (UEL).

Maverick Building Systems, Inc. (U-63-17-05135)

During the inspection, Mr. Glenn Johnson (Phone: NA; Cell: 248-321-2921; Fax: 248-366-9413; E-mail: Glenn@MavBldgSys.com), President and Owner, assisted me.

Founded in 1996, Maverick is in the business of manufacturing building trusses. Maverick is a wholesaler of engineered wood products for primarily residential buildings.

Maverick operates computer controlled truss component saws (26 inches diameter).

The two (2) component saws (MiTek Smart Set Pro) cut wood (stud) to a desired size. The large wood chips fall near the saw by gravity. A vacuum system is located underneath the machine to capture saw dust and exhaust is ducted via common manifold. Saw dust is carried to an air pollution control device (APCD) consisting of one cyclone (located outside the building) and five (5: reduced from ten to five upon the move) bags arranged in series (all bags are located inside the building). The large particles are collected by the cyclone and saw dust is collected in one hopper. Saw dust fines are transported back into the building and filtered by five large bags (dimensions: 6 ft. H and 18 inches diameter). Filtered air is released to in-plant environment.

The component saws are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l) provided a combination of a cyclone and 5 bags are operated properly.

During FY 2017 inspection both one (1) cyclone and five (5) bags were operating properly; no visible emissions (VE). While the inside bags (5) are emptied once per month, the outside cyclone's hopper is emptied once per week. Unlike the previous location on Goldie Street, where APCD (one cyclone plus ten large bags in series) was not operated properly, saw dust was not spilled on soil outside.

AQD issued Violation Notices dated June 21, 2007, based upon May 21, 2007, inspection and May 07, 2008, based upon February 20, 2008, inspection for not operating the APCD. Mr. Bill Carlton stated that APCD was not effective.

The following are significant dates.

<u>Maverick Building Systems. (N7827)</u> <u>Roof Truss Mfg. Company</u>	
DATE	COMMENT
05/21/2007	AQD inspected Maverick and found that large scale wood-cutting machine, component saw (26 inches in diameter), was operating while the air pollution control device (APCD), consisting of one

cyclone and bags properly at new location. In addition, C. A Hull is in compliance with cold-cleaner rules except posting of operating procedures (DEQ Decal)

FYI: VN

June 21, 2007

CERTIFIED MAIL

Mr. Glen Johnson
Maverick Building Systems
8225 Goldie
Walled Lake, Michigan 48390

SRN: N7827, Oakland County

Dear Mr. Johnson:

LETTER OF VIOLATION

On May 21 and May 30, 2007, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), conducted an inspection of your facility located at 8225 Goldie Street, Walled Lake, Michigan. The purpose of this inspection was to determine your 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); MDEQ-AQD's administrative rules.

During the inspection, the following air pollution violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Wood Cutting Process for Building Truss Manufacturing ⁶	Rule 336-1910 (Rule 910)	The air pollution control device was not operating when the wood cutting process was operating.
⁶ Pursuant to Rule 336.1285(l), the Wood Cutting Process is exempt from Rule 336.1201 (Permit-to-Install) if the particulate emissions are controlled by an appropriately designed and operated air pollution control device (APCD) such as cyclone followed fabric filter collector (10 bags of size 6 feet tall & 2 feet diameter). If the APCD is not operated properly, the process is not exempt from Rule 201.		

On May 21 and 30, the AQD staff observed operation of the wood cutting process while the air pollution control device (APCD) consisting of one cyclone and 10-bag fabric filter was turned off because of APCD noise. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please be advised that sawdust emissions must be captured by appropriately designed capture system in order to deliver air contaminants to the air pollution control device (APCD) consisting of one cyclone and 10-bag fabric filter. Sawdust on the plant floor is a sign that the capture system is not working properly. Besides, the collected air contaminants in APCD must be handled properly such that the contaminants are not spilled on ground or released to ambient air.

You should immediately initiate necessary actions to correct the cited violations. **Additionally, please submit a report of your program for compliance with the above cited rules by July 12, 2007.** At a minimum, this report should explain the causes and duration of the violations, whether the violations are ongoing, remedial action taken, and what steps are being taken to prevent a

During the inspection, the following air pollution violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
Wood Cutting Process for Building Truss Manufacturing	Rule 336-1201 (Rule 201) Permit-to-Install	Maverick Building Systems ("Maverick") installed this process without first obtaining a Permit-to-Install. ⁶
Wood Cutting Process for Building Truss Manufacturing	Rule 336-1910 (Rule 910)	The air pollution control device was not operating when the wood cutting process was operating.
⁶ Pursuant to Rule 336.1285(l), the Wood Cutting Process is exempt from Rule 336.1201 (Permit-to-Install) if the particulate emissions are controlled by an appropriately designed and operated air pollution control device (APCD) such as cyclone followed fabric filter collector (10 bags of size 6 feet tall & 2 feet diameter). If the APCD is not operated properly, the process is not exempt from Rule 201. Based upon AQD's observations, Maverick consistently operated the Wood Cutting Process while APCD was deliberately turned off in spite of being reminded repeatedly that a proper operation of an existing APCD was required by applicable state and federal clean air laws and regulations.		

During most of the inspections, it was noted that you had installed and commenced operation of an unpermitted Wood Cutting Process at your facility. The AQD staff advised you this was a violation of Act 451, Rule 201, which states in part;

"A person shall not install, construct, reconstruct, relocate, alter, or modify any process or process equipment, including control equipment pertaining thereto, which may emit an air contaminant, unless a Permit to Install which authorizes such action is issued by the department."

Be advised that Rule 201 requires that an air use permit be obtained prior to installation, construction, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Be advised that the AQD may initiate appropriate enforcement action for your unpermitted installation and operation of this process equipment. Furthermore, continued operation of unpermitted equipment is not authorized.

On May 21 & 30, October 10 & 30, December 18, 2007, and February 20, April 24, 2008, the AQD staff observed operation of the wood cutting process while the air pollution control device (APCD) consisting of one cyclone and 10-bag fabric filter was turned off because of APCD noise. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law. Upon AQD's request, the APCD was turned on. AQD confirmed that APCD was in good working condition although the capture system needs some improvement.

In addition, a letter of violation (LOV) was issued to Maverick on June 21, 2007, for violation of Rule 910. This LOV was issued as a result of observations made during the inspections of May 21 and 30, 2007. In spite of AQD's frequent emphasis of Maverick's (Mr. Glen Johnson's) obligation to respond to the LOV in writing, the AQD has never received a written response.

On February 20, 2008, Maverick's yard was snow covered. On this day, snow-covered soil had substantial wood saw dust fall-out. This indicated recent fall-out. Contrasting white background revealed it well.