

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

P005934513

FACILITY: Silver Street Inc		SRN / ID: P0059
LOCATION: 892 Industrial Park Dr, SHELBY		DISTRICT: Grand Rapids
CITY: SHELBY		COUNTY: OCEANA
CONTACT: Randy Seaver , President		ACTIVITY DATE: 04/27/2016
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: The purpose of this inspection was to determine compliance with Permit to Install No. 136-12 and all other applicable Air Quality Rules and Regulations.		
RESOLVED COMPLAINTS:		

On Wednesday April 27, 2016 AQD Staff Kaitlyn DeVries (KD) conducted an announced, scheduled inspection of Silver Street Inc. located at 892 Industrial Park Dr., Shelby Michigan. The purpose of this inspection was to determine compliance with Permit to Install No. 136-12 and all other applicable Air Quality Rules and Regulations. This inspection was announced, due to a request by Silver Street for help with MAERS reporting.

KD arrived at the facility at approximately 10:00 am and observed the area for any odors or excess opacity prior to entry to the facility. None were observed. KD met with Mr. Randy Seaver, President, who accompanied KD on a tour of the facility. KD presented Mr. Seaver with the Environmental Rights and Responsibilities pamphlet, which was briefly discussed. After a tour of the facility KD and Mr. Seaver discussed the requirements for MAERS reporting for 2015. KD left the facility at approximately 12:00 pm.

Facility Description

Silver Street Inc. (Silver Street), otherwise known as Media Technologies, is a manufacturer of wood school, library, and office furniture. The facility is comprised of two (2) buildings located across the street from one another. One building primarily serves as a warehouse and holding facility, with some small woodworking operations, while the other building houses the majority of the facilities operations. Further information on the processes is detailed in the compliance evaluation portion of this report. Silver Street operates at most two (2) shifts per day, five (5) days per week, and employs approximately 65 employees.

Regulatory Analysis

Silver Street currently holds one (1) permit, a Hazardous Air Pollutant (HAP) Opt-Out permit, PTI No. 136-12. Since Silver Street accepted the Opt Out limits, they are not subject to 40 CFR Part 63 Subpart JJ for Wood Furniture Manufacturing Operations; thus they are not subject to any Federal Regulations at this time.

Silver Street does, however, utilize several Rule 201 permitting exemptions which will be detailed in the Compliance Evaluation section below.

Compliance Evaluation

Exempt Emission Units

The facility has several cutting, routing, drilling, sawing, and sanding stations in both buildings. Several of these processes are vented to one of several baghouses located throughout the facility, while others are exhausted back into the in-plant environment. These processes are exempt from Rule 201 permitting under Rule 285 (i) (vi).

Silver Street has two (2) small adhesive coating lines; one is exempt from Rule 201 permitting under Rule 287 (a), since the emissions are below the required 2 gallons per day and are released into the in-plant environment, and the other is exempt under Rule 287 (i), as the wood glue is a hot melt adhesive.

There are two (2) spray coating booths, in addition to the permitted flat line. One (1) booth is small, and is primarily used for overflow parts and touch-ups. The other, larger booth is used more frequently. Both of these booths are exempt from Rule 201 permitting under Rule 287 (c) – please see attached records. Per Mr. Seaver, both of these booths use High Volume Low Pressure (HVLP) applicators.

One more spray booth, which is utilized for laminating, utilizes contact cement. This is also exempt from Rule

201 permitting under Rule 287 (a). Per Mr. Seaver, the filters used in this process are changed on an as needed basis. Per a visual inspection of the filters in this booth, KD suggested they be changed.

Additionally, Silver Street does not have any boilers, emergency generators, or cold cleaners.

EU-FLATLINE

This emission unit encompasses a wood furniture coating line that utilizes a flat-line twin spray machine with eight (8) spray guns and a natural gas-fired flash oven. This line was in operation at the time of the inspection, and per Mr. Seaver, the oven operates at a temperature of 85 – 100 °F and utilizes HVLP applicators. While the stack dimensions of the oven and the flat-line were not explicitly measured, there appeared to be no changes.

This line primarily sprays stains and lacquers on the parts going through the line, all spent filters and waste containers appeared to be properly closed and disposed of. Silver Street requested and AQD approved the use of manufacturer's formulation data for verification of Volatile Organic Compounds (VOC) and formaldehyde content for all stains, sealers and topcoats used at the facility. Per verification with the manufacturer, the SDS's are based on the products actual formula, and are not a result of each batch. As such, the VOC content of the sealers are limited to 3.3 lb. /gallon, and the attached SDS indicates a VOC content of 2.77 lb./gallon. VOC content of the stains are limited to 2.2 lb/gallon; the attached SDS indicates the VOC content of the stains is 2.19 lb./gallon. The topcoat has a VOC content limit of 5.0 lb. /gallon, and the SDS indicates a VOC content of 4.07 lb./gallon. Per the attached records, it appears as of Silver Street is properly tracking the material (sealer, stain, topcoat, etc) usage and emissions. VOC and acetone emissions are limited to 25.0 tons per year (tpy). Per the attached records the VOC and acetone emissions as of March 2016 were 6.4951 tons. Additionally, formaldehyde emissions are limited to 2277 lb./year, and as of March 2016, emissions were 3.2 lbs. These emissions are consistent with what was reported in the 2015 MAERS report.

Per Mr. Seaver, the filters are replaced on an as needed basis and are properly disposed of.

FG-FACILITY

This flexible group contains all process equipment source-wide including equipment covered by other permits, grandfathered equipment and all exempt equipment. Silver Street is adequately tracking the HAP content and usage of each of its HAP containing materials, and is using manufacturers data, as previously mentioned. Silver Street is tracking the amount of materials re-claimed via the use of a distilling process, however, KD recommends improving this by adding a column indicating how much is re-claimed to the FG-FACILITY spreadsheet.

Hazardous Air Pollutants (HAP's) are limited to 9.0 tpy, individually, and are limited to 22.5 tpy, aggregately. As of March 2016, mixed xylenes were the highest emitted HAP during this period, with the 12-month rolling emissions of 0.1224 tons. Aggregately, the 12-month rolling HAP emissions were 0.1735 tons.

Compliance Determination

Based on the observations made during the time of the inspection and a subsequent review of the records, it appears as if Silver Street Inc. is in compliance with PTI No. 136-12 and all applicable Air Quality Rules and Regulations.

NAME *Lauryn Rubin*

DATE *5/23/16*

SUPERVISOR *PAB*