

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

FY2016 Insp -  
P0577

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FACILITY: Brunt Associates Carpentry and Millwork	SRN / ID: P0577
LOCATION: 48953 Wixom Tech Dr., WIXOM	DISTRICT: Southeast Michigan
CITY: WIXOM	COUNTY: OAKLAND
CONTACT: Brian Brunt	ACTIVITY DATE: 05/18/2016
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance
SUBJECT: FY 2016 inspection of Brunt Associates Carpentry and Millwork	SOURCE CLASS: MINOR
RESOLVED COMPLAINTS:	

P0577 - SAR - 2016 05 18

**Brunt Associates Carpentry and Millwork (P0577)**  
48953 Wixom Tech Dr.  
Wixom, Michigan 48393-3558

[www.BruntAssociates.com](http://www.BruntAssociates.com)

Phone: 248-960-8295

Fax: 248-960-8296

**Building status:** About April 2016, Brunt Assoc. sold (\$72 per sq. ft. and 23,000 sq. ft. area with heated floors) the building to RAMPF Group, Inc. (U-63-15-01805). Brunt will move out by May 23, 2016. Brunt Associates will continue to stay in business as contractor but it will outsource manufacturing.

**VN:** AQD issued Violation Notice dated December 22, 2014, for failure to operate the booth coating (paint, stain, varnish, lacquer etc.) properly as designed and intended.

**Subject to:** Permit (Rule 201) exemption rules 287, 285, 281; conditional exemptions.

**Not Subject to:** NESHAP/ MACT T, area source National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; NESHAP/ MACT T); Correction; 29484 Federal Register / Vol. 60, No. 107 / Monday, June 5, 1995 / Rules and Regulations; amended National Air Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T); Final Rule; Page 25138 Federal Register / Vol. 72, No. 85 / Thursday, May 3, 2007 / Rules and Regulations. Solvents containing halogenated compounds are not used.

On April 18, 2016, I conducted a level 2 self-initiated inspection of Brunt Associates Carpentry and Millwork ("Brunt") located at 48953 Wixom Tech Dr., Wixom, Michigan 48393-3558. The inspection was 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.

During the FY 2016 inspection, Mr. Brian J. Brunt (Phone: 248-295-4610 – Direct; Cell: NA; Fax: 248-960-8296; E-mail: Brian@BruntAssociates.com), Owner and President, and Mr. Steve Fromm (Phone: 248-295-4613 – Direct; Cell: NA; Fax: 248-960-8296; E-mail: Steve@BruntAssociates.com), Estimator, assisted me.

Mr. Dave Adair (Phone: 248-295-4608 – Direct; Cell: NA; Fax: 248-960-8296; E-mail:

Dave@BruntAssociates.com), Shop Forman, separated about March 2016.

Brunt Associates is in woodworking business: Architectural & Cabinet Woodwork, Carpentry Contractors, Millwork, etc. Most business dealings are with institutions such as universities, churches, schools, hospitals, etc.

About April 2016, Brunt Assoc. sold (\$72 per sq. ft. and 23,000 sq. ft. area with heated floors) the building to RAMPF Group, Inc. (U-63-15-01805), 49037 Wixom Tech Dr. Wixom, Michigan 48393-3558. RAMPF, which generally makes two-component (A & B) polyurethanes, is expected to use this for storage of raw materials and products. Also, coating spray booth is sold to a Canadian company and will be picked up by May 23, 2016. Brunt will continue to stay in business but manufacturing will be outsourced.

### **Rule 287(c) Paint Spray Booth**

One water-based and solvent-based collision shop style paint spray booth (15 ft. W x 20 ft. D x 10 ft. H) with a back-draft dry filter system is present. The back-draft dry filter system consists of 12 filter panels. Intake air filter system is present to enhance product finish quality. Paint and solvent usage records are not kept.

I asked Mr. Fromm to install and inspect the filters such that they fit, at all times, snugly without gaps and holes. I also asked him to keep records of paint and solvent usage according to Rule 336.1287(c). Painter's or duct tapes may be used to repair gaps and holes.

The booth is exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.287(c).

Upon keeping usage records and operating the booth properly as designed and intended, the coating booth meets all of the Rule 336.1287(c) conditions:

1. The coating use rate is not more than 200 gallons, as applied, minus water, per month.
2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
3. Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

It is estimated that 10-20 gallons of coatings were used in CY 2014 as result of ongoing great recession in construction industry. Brunt used 60-70 gallons per month in 2007. Both water-based and solvent-based coatings are used: latex paint, lacquer finishes, stains, clearcoats (CC are always solvent-based), etc. The filter system was full of gaps and holes during October 24, 2014, inspection. On December 4, 2014, the booth's doors (both entrance door and one near the filter system) were open thus affecting coating over-spray particulate matter capture and control via changed dynamics of air flow. See Violation Notice information below.

For proper air balance and control of paint / coating over-spray particulate control, the booth ought to be operated properly as designed and intended: all doors must be closed such that supplied air flow is via the intake air filter system and exhaust air flow is via the paint over-spray filter system. Such proper operation will improve finish quality as well.

As stated above, this booth is sold and will be removed by May 23, 2016.

### **FY 2015 Violation Notice**

AQD issued Violation Notice (VN) dated December 22, 2014 (Rules 336.1201 & 336.1910), for not operating the wood finish booth properly according intent and design of the booth. In addition to the filter system gaps and holes, Brunt changed dynamics of air flow (intake and exhaust) by keeping the doors (entrance door and door near filters) open during operation of the booth.

### **11 wood cutting, sanding, milling, sanding machines**

11 wood cutting, sanding, milling, sanding, etc. machines are present. Each machine is equipped with its own capture device for particulate matter (saw dust) emissions. The captured saw dust laden exhaust gases used to be transported via a common manifold to one common baghouse. However, the common baghouse (Murphy Rogers dust collector) consisting of about 100 bags is sold and removed.

Murphy Rogers dust collector is replaced by two baghouses (Dustek):

1. Four bags, 8 ft. tall and 2 ft. diameter with four plastic bags as hoppers
2. Three bags, 5 ft. tall and 2 ft. diameter with three plastic bags as hoppers

The woodworking machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(l).

### **Cold-cleaner – Herkules paint gun washer**

There is one Herkules paint gun washer of capacity 25 gallons. The cold-cleaners are subject rule 336.611 or 336.1707 depending on if it is new or existing. A cold-cleaner is exempt from Rule 336.1201 pursuant to Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

The 25-gallon capacity gun cleaner is located inside the coating booth. During the inspection, the mechanically-assisted lid was closed.

The Cold-cleaner is NOT Subject to: 40 CFR, Part 63, Subpart T, NESHAP/ MACT T, since solvents containing halogenated compounds are not used.

On December 4, 2014, I gave DEQ's decals for "cold-cleaner operating procedures" for posting and complying with work-practice rules. I asked the company to follow the common sense work practice in the procedures.

Allpro lacquer thinner G22210 is used as degreasing solvent.

100% VOC solvent (20-25% MEK, 10-15% petroleum naphtha, 20-25% heptane, 10-15% cyclohexane, 5-10% toluene, xylene, benzene, etc. Flash Point (FP) = NA °F TCC. Auto Ignition = NA °F. Boiling Point (BP) = NA °F @ 760 mm Hg. Vapor Pressure (VP) = NA mm Hg at 68 °F. Specific Gravity (SG, Water = 1.0) = 0.81. Density (ρ) @ 68 °F = 6.64 lbs. / gallon (0.81 kg /L). Flammability range = NA %v (LEL) – NA %v (UEL).

### **Building Sold**

About April 2016, Brunt Assoc. sold (\$72 per sq. ft. and 23,000 sq. ft. area with heated floors) the building to RAMPF Group, Inc. (U-63-15-01805), 49037 Wixom Tech Dr. Wixom, Michigan 48393-3558. Also, coating spray booth is sold and will be picked up by May 23, 2016. All fabrication equipment will be sold and removed from the building by May 23. Brunt Assoc. will stay in business but will cease fabrication operations.

### Conclusion

Building is sold and all process equipment will be removed by May 23, 2016. Brunt Assoc. will stay in business but will cease fabrication operations via outsourcing all manufacturing.

FYI: VN      December 22, 2014

NAME J. L. McNamee      DATE 05/16/2016      SUPERVISOR CJE