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

P111302039		
FACILITY: California Closets Company		SRN / ID: P1113
LOCATION: 4930 Kraft Avenue SE, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Robert Tomlinson, Facilities Maintenance Manager		ACTIVITY DATE: 02/26/2020
STAFF: David Morgan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

At 2:00 P.M. on February 26, 2020, Air Quality Division (AQD) staff Dave Morgan conducted an unannounced scheduled inspection of California Closets located at 4930 Kraft Avenue in Cascade Township. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations. Accompanying AQD staff on the inspection was Robert Tomlinson, Facilities Maintenance Manager.

#### FACILITY DESCRIPTION

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California Closets is a manufacturer of modular furniture. This facility started operations in 2017 and primarily conducts precision machining for wood and synthetic wood products. The machining operations are controlled by a baghouse. There are no other regulated air pollutant emitting processes at the facility.

# COMPLIANCE EVALUATION

### Woodworking equipment:

The company has about 17 woodworking machines that exhaust to an associated baghouse. The baghouse is a Waltz Holst, Dustar baghouse with a rated airflow capacity of 82,500 cfm. All dust from the machining equipment is sent to the baghouse and all sawdust is collected in two rolloff bins and shipped off-site for disposal. According to Mr. Tomlinson, the baghouse was purchased used and installed in 2017 and completely refurbished. Mr. Tomlinson indicated that the bags would likely be ready for replacement in 2020. The baghouse appeared to be installed and operating properly and vented indoors at the time of the inspection. There were no visible emissions from the process at the time of the inspection.

Although the baghouse appeared to be working properly, there was a considerable amount of sawdust on the ground around the bins, the ductwork leading to the bins, and the loading bay. The sawdust on the ground was wet and had a mud like consistency due to the recent snow; it was not light and dry that could blow around. According to Mr. Tomlinson, the sawdust on the ground was the result of a snow plow driver hitting one of the bins and damaging the duct from the baghouse to the bin. AQD staff observed repairs to the ductwork. Due to the recent snow, it was difficult to determine if the dust on the ground was the result of an ongoing problem, the singular snow plow event, problems with the bin door seal, or problems with the duct connection. Mr Tomlinson committed to cleaning up the sawdust by March 6, 2020. AQD staff will follow-up to ensure cleanup. AQD staff advised Mr. Tomlinson that additional actions may be necessary if the sawdust remains exposed on the ground and around the bins.

The woodworking machines can be considered exempt from air use permitting under Michigan Air Pollution Control Rule 285(2)(I)(vi) because they are controlled by an appropriately designed fabric filter collector (baghouse) in accordance with the rule. It is noted that according to the manufacturer, the control efficiency of the baghouse is 99.99% by weight and that the bags will emit no more than 0.005 grams per dry standard cubic feet per meter (DSCFM). Information from the manufacturer is attached. The equipment also meets the criteria under Rule 278 because worse case potential to emit calculations would be 0.02 tons per year which is below the 10 ton per year threshold in Rule 278 for particulate matter of 2.5 microns. The potential to emit was calculated using a regulatory limit of 0.1 lbs/1,000 lbs of exhaust gases, rated airflow capacity, and manufacturer control efficiency.

#### Bonding:

The company uses heat applied polyvinyl chloride (PVC) for edge banding as well as a limited amount of hot melt adhesive. These are exempt from permitting under Rule 287(2)(i).

## **SUMMARY**

California Closets is in compliance with applicable requirements. Additional follow-up will be taken to ensure that the sawdust material has been disposed of properly.

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Page 1 of 1