

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

U50150824930537

FACILITY: Division 6 Fabrication and Installation LLC		SRN / ID: U501508249
LOCATION: 24201 Hoover Road, Warren		DISTRICT: Southeast Michigan
CITY: Warren		COUNTY: MACOMB
CONTACT: David Kurtz , Owner		ACTIVITY DATE: 07/15/2015
STAFF: Samuel Liveson	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self-initiated inspection of an unregistered facility.		
RESOLVED COMPLAINTS: C-15-01056		

On Wednesday July 15, 2015, I conducted an unannounced, self-initiated, level 2 inspection of Division 6 Fabrication and Installation (Division 6) in response to complaint C-15-01056 received July 10th. Division 6 is located at 24201 Hoover Road in Warren, Michigan. The purpose of this inspection was to determine the facility's compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and to investigate AQD Complaint No. C-15-01056.

Complaint Investigation

The complaint was originally assigned to another facility. Discussions in the area led to the complaint being investigated at Division 6. Around 2:00 pm on July 15th there was a northerly wind (headed south) at around 10 miles per hour according to accuweather.com. I drove along Kaltz Avenue upwind of the facility and detected no odor. I walked along Stephens Road around 2:10 pm downwind of the facility and detected no odor. I left a voicemail with the complainant on July 16th.

Opening Meeting

I arrived on site around 3:30 pm. I met with Mr. David Kurtz, Owner and Facility Manager. Mr. Kurtz provided a site walkthrough and explained equipment and operations. I provided Mr. Kurtz with my contact information and a copy of the pamphlet "DEQ Environmental Inspections: Rights and Responsibilities."

Division 6 performs design and fabrication of cabinetry. There is no sign on the building entrance because all projects are bid, so customers don't visit the building. The facility uses pre-laminated Medium Density Fiberboard (MDF) and No Added Urea Formaldehyde (NAUF) particle boards and plywood. The company has approximately five employees and operates from 7 am to 3:45 pm Monday through Friday.

Facility Walk-Through

Wood Fabrication Equipment

Division 6 has wood fabrication equipment such as a CNC router and a panel saw. Dust from these machines is collected in a dust collector in the facility, and emissions are vented into the general in-plant environment. Wood fabrication equipment appears to be exempt from permit requirements per R 285(I)(vi)(B).

Adhesive Coating Operations

The facility applies adhesive to panel by pouring adhesive from 5-gallon containers onto wood and using rollers to spread out the adhesive, then holding panels together until the adhesive

is dry. The facility outsources more intense layups. Adhesive emissions are released into the in-plant environment.

The adhesive used is Wilsonart 3000. According to its MSDS the adhesive contains no hazardous air pollutants. The adhesive contains less than 20 grams of volatile organic compounds per liter per Method 24 analysis.

On July 21, Mr. Kurtz provided facility purchase records for 2014 and 2015. The facility purchased 48 5-gallon buckets of adhesive in 2014. So far the facility has purchased 35 5-gallon buckets of adhesive in 2015. Considering Division 6 operates Monday – Friday, the facility used an average of 0.9 gallons of adhesive per weekday in 2014, and an average of 1.2 gallons per weekday in 2015.

The adhesive coating operation appears to be exempt from permitting requirements per R 287(a).

Conclusion

Based on the AQD inspection and purchase records review, it appears that Division 6 is in compliance with the federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Because no odors were detected and the facility appears to be in compliance, AQD Complaint No. C-15-01056 is resolved. Future investigations will be conducted if further complaints are received.

NAME Aan [Signature] DATE 8/11/2015 SUPERVISOR CJE