

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

N151330439

FACILITY: Architectural Door and Millwork, Inc.		SRN / ID: N1513
LOCATION: 30150 South HILL RD., NEW HUDSON		DISTRICT: Southeast Michigan
CITY: NEW HUDSON		COUNTY: OAKLAND
CONTACT: Christine Matovski, Accounting Department		ACTIVITY DATE: 04/10/2015
STAFF: Rebecca Loftus	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT:		
RESOLVED COMPLAINTS:		

On April 9 and 10, 2015, I, Rebecca Loftus, from the Department of Environmental Quality's (DEQ), Air Quality Division (AQD), conducted an inspection of Architectural Door and Millwork (ADAM), SRN: N1513, located at 30150 S. Hill Road, New Hudson, 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 of 1994, PA 451, as amended, Michigan's Air Pollution Control Rules, and Permits to Install (PTIs) No. 59-06 and No. 61-07.

Upon my arrival on April 9, 2015, I was told my previous facility contact no longer works for ADAM. The new contact was out sick and would be back tomorrow.

On April 10, 2015, I arrived at the facility at 9:30am and met with Mr. Dave Kase, Painter/Finishing Department, and Ms. Christine Matovski, Front Office/Accounting. I explained the reason for my inspection and provided Ms. Matovski with DEQ's "Environmental Inspections: Rights and Responsibilities" brochure and a copy of the PTI Exemption Handbook.

Facility Overview

ADAM was founded in 1990 and in 2004, purchased the building located at 30150 S. Hill Road from a plastic part manufacturing and coating operation (Plastech Engineered Products) which operated eight coating lines. ADAM dismantled/rendered inoperable six of the coating processes and kept two spray booths. At the time of my inspection, Mr. Kase explained they only utilize one booth; the other is used for paint storage.

ADAM is a door and millwork company that manufactures and distributes various doors (mostly wooden, some steel) and hardware to residential homes, commercial businesses, and retail stores. At this time, ADAM is mostly manufacturing for commercial businesses and approximately 90% of the doors and moulding manufactured/milled at ADAM are sent to customers unfinished (unstained/unpainted).

PTI No. 59-06 and PTI No. 61-07

PTI No 59-06 is a general coating permit that was issued to ADAM for the use of two manual spray booths. The general permit contains a 10 tons per line limit and a 30 tons facility wide VOC limit. Because this equates to a greater than 10 ton potential to emit for any single Hazardous Air Pollutant (HAP), ADAM obtained an Opt-Out Permit, PTI No. 61-07, to opt the facility out of the requirements of the Clean Air Act of 1990, Title V, Renewable Operating Permit (ROP) program.

Per PTI No. 59-06 special condition I(B & C), the facility must install and maintain a dry filter particulate control system for both spray booths. During my inspection, I noted that ADAM is only operating one paint booth; the other paint booth is used as storage of paint cans. Painted doors were hanging near the booth during my inspection; however no one was actively painting. I noted old overspray near the filters but new filters were in place and appeared to be fitted properly. Mr. Kase explained approximately 20-30 doors are painted each week (depending on work orders) and the filters are changed once every two months. Painters use Kremilin HVLP paint guns with quart size cups; paints are purchased in 1-5 gallon quantities. Lacquer thinner or acetone is used to clean-up and purge the paint guns; this material is reclaimed and sent off to a waste disposal company.

Record Keeping

Since my last inspection, the facility contact and person responsible for keeping the paint usage/emission records no longer works for ADAM. Ms. Matovski is now responsible for the record keeping associated with ADAM's air permits.

Ms. Matovski was able to provide me with the record keeping from January 2013 through December 2014 (see attached). Per PTI No. 61-07 special condition 2.2, manufacturer's formulation data is used to calculate emissions. Below is a summary of the monthly data.

Month	Usage (gallons)	VOC Emissions (lbs)	HAP Emissions (lbs)
January 2013	48.25	261.26	16.705
February 2013	159	728.60	150.740
March 2013	195	883.85	180.320
April 2013	104	490.98	90.470
May 2013	56	305.29	41.370
June 2013	44	256.56	40.770
July 2013	10	43.97	0.040
August 2013	10	49.40	0.000
September 2013	42.5	210.425	0.270
October 2013	16.50	82.43	0.000
November 2013	25.00	119.14	0.300
December 2013	44.50	219.41	0.280
January 2014	17.25	81.82	0.023
February 2014	32.50	161.03	0.270
March 2014	41.50	204.88	0.270
April 2014	36.50	180.18	0.270
May 2014	21.50	106.08	0.270
June 2014	30.25	159.55	0.033
July 2014	9.25	49.33	0.013
August 2014	27.00	126.06	0.020
September 2014	12.00	56.75	4.900
October 2014	20.50	101.58	0.000
November 2014	6.75	40.83	0.005
December 2014	26.50	148.53	8.203

On April 21, 2015, Ms. Matovski emailed me the following monthly usage for 2015: January was 44.25 gallons, February was 30 gallons, and March was 45 gallons. Ms. Matovski also requested to void PTI No. 59-06 and No. 61-07; instead ADAM would like to use the Rule 287(c) exemption for their paint booth.

Conclusion

Based on my inspection observations and the records provided, ADAM appears to be in compliance with the Federal Clean Air Act and Michigan's Air Pollution Control Rules. Based on the record keeping it appears ADAM can use the Rule 287(c) exemption. As requested by ADAM, an email will be sent to Lansing to void PTIs No. 59-06 and No. 61-07. I will follow-up with Ms. Matovski to ensure ADAM continues to keep monthly usage records.

UPDATE

September 10, 2015, I requested that Ms. Matovski send me the monthly usage records for April 2015 through August 2015.

NAME Rebecca J. [Signature] DATE 4/30/15 SUPERVISOR CTE
update 9/10/15