



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Prestige Custom Cabinetry & Millwork, Inc., Green Bay, WI

FROM: Valeria Apolinario, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Prestige Custom Cabinetry & Millwork, Inc.

Facility Location: 476 Packerland Drive Green Bay, WI 54303

Date of Inspection: August 16, 2022

U.S. EPA Inspector(s):

1. Valeria Apolinario, Environmental Engineer
2. Jason Schenandoah, Environmental Engineer

Other Attendees:

1. Mike Mashl, Owner
2. Mike Glass, Shop Foreman
3. Angie Moeller, Business Manager
4. Brittany Nichola, Oneida Nation Inspector

Contact Email Address: angie@prestigecab.com

Purpose of Inspection: The facility is located within the exterior boundaries of the Oneida Tribe of Wisconsin and was issued a Part 49 Minor NSR Permit by U.S. EPA Region V. U.S. EPA conducted a Full Compliance Evaluation of the facility.

Facility Type: Wood Kitchen Cabinet and Countertop Manufacturing

Regulations Central to Inspection: The facility's Construction Permit with Synthetic Minor Limits (SYN-ON-55009R0004-2014-01) lists the following requirements:

Emission Limitations and Standards

- Yearly, in tons/years (tpy), and monthly, in tons/month, volatile organic compound (VOC) emission limits based on a 12-month rolling summation and average.
- Single and combined HAP emission limits, in tpy and lbs/month average, based on a 12-month rolling average.
- PM emission limits, in lbs/hr, for the manufacturing process and three spray booths. The facility shall not emit more than 0.90 lbs/hour PM from units in Process P04.
- The facility is required to utilize high-volume low-pressure spray guns and control overspray with wall panel filters rated at a minimum control efficiency of 98 percent.
- PM emissions from the woodworking process are to be controlled with the use of the baghouse.
- At all times, including start-up, shut-down, and malfunction, the facility shall maintain and operate all sources, including associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions.

Monitoring and Testing

- The facility shall inspect the wall panel filters for the spray booths daily for proper fit, placement, and condition.
- The facility shall inspect the magnehelic gauge readings of the baghouse for the wood working process once per 8 hours of operation.
- The facility shall inspect the baghouse daily for proper operation in accordance with the manufacturer's operations manual.

Recordkeeping and Reporting

- The facility shall maintain a file containing the records specified below. The facility shall retain all records for at least five years following the creation of such records. These records include:
 - All calibration and maintenance records, all original recording for continuous monitoring instrumentation and gauge reading, and copies of all reports required by the permit.
 - Records of all monitoring required by the permit and information about monitoring including, but not limited to:
 - Monthly product usage of stains, sealers, topcoat, and paint, to determine in tons per month and tpy the VOC emissions.
 - Monthly HAP emissions, in lbs/month, and the most recent 12-month average, in tpy, of each single HAP emitted. Monthly product usage will also determine HAP emissions.
 - Monthly PM emission, in lbs/month, and most recent 12-month average monthly emissions, in tpy, of PM emitted.
 - Records of the daily wall filter and baghouse inspections.
 - Usage of all stains, sealers, paints, topcoats, lacquer thinner, and cleaning solvents on a monthly basis, and calculate the monthly average VOC and HAP emissions in tons/month and 12 month rolling average VOC and HAP emissions in tpy. The calculation for VOC and HAP emissions is

based on 100% of the VOC and HAP content of the product used at the facility being emitted, and no VOCs or HAPs being retained in the final product.

- The permittee shall record manometric gauge readings of the baghouse once per 8 hours of operation and the daily baghouse inspections.

Arrival Time: 9:05am

Departure Time: 9:55am

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet — via email
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Mike Mashl, Mike Glass, and Angie Moeller unless otherwise noted.

Process Description:

Prestige Custom Cabinetry (Prestige) manufactures custom wooden cabinetry. The main processes of the facility are the assembly and painting of the cabinets. Solid lumber is first cut and assembled into cabinets. Particulate emissions from the wood cutting are controlled by a dust collector. Collected wood particulates are routed to a trailer and ultimately utilized by a third-party. Assembled cabinets are then sanded. Cabinets are then painted, stained, sealed, coated with a topcoat, or any combination of the previously listed processes. Most paints, sealers, and topcoats are applied with high-volume, low-pressure spray guns, while stains are generally applied with a rag. Overspray from the spray guns is drafted into wall filters. The cabinets are then cured in a dry-off oven in the spray room. Fully cured cabinets are loaded onto trucks for shipment.

Staff Interview:

- The facility shop operates one shift from 6am to 4:30pm, from Monday to Thursday.
- The bags in the baghouse are shaken down daily.
- Baghouse pressure drop recordings are taken daily; staff stated that the pressure drop is typically recorded at 0.1 psi.
- Wall paint filters are changed once per week but inspected and cleaned daily.
- A full bag inspection of the baghouse occurs once per year; staff mainly look for tears to determine if and how many bags need replacement.

- The facility monitors and records the gallons of paint, sealers, stains, and topcoats utilized daily.
- The facility sends usage data to a third party to calculate emissions and obtain emissions reports.

TOUR INFORMATION

U.S. EPA Tour of the Facility: Yes

Data Collected and Observations:

U.S. EPA inspectors observed that ductwork was connected to the cutting operations at the facility and routed to the baghouse. At the baghouse, U.S. EPA inspectors observed a minimal amount of wood shavings escaping the baghouse. Prestige personnel stated that the escaping wood shavings were from a loose screw in the ductwork. The baghouse pressure drop was recorded as 0.1 psi.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

As a part of the Full Compliance Evaluation, U.S. EPA requested the following documents for four years prior to the inspection:

- Any documentation of the paint wall panel filters that indicates the control efficiency of the filters.
- Manufacturer's operation manual for the baghouse.
- Monthly usage of stains, sealers, topcoats, paints, lacquer thinners, and cleaning solvents, in gallons.
- Monthly HAP emissions, in pounds per month.
- 12-month average monthly emissions of each single HAP emitted, in pounds per month.
- 12-month average monthly emissions of total HAPs emitted, in pounds per month.
- Monthly and 12-month rolling emissions of PM emitted in pounds per month and tons per year, respectively.
- Monthly and 12-month rolling average emissions of VOCs and HAPs emitted in tons per month and tons per year.
- Records of daily wall filter and baghouse inspections at the facility.
- Records of daily pressure drop gauge readings.
- Any records of emissions testing from emission units or baghouse, if available.

Concerns: U.S. EPA inspectors communicated that the permit obligates daily baghouse inspections and for records to be maintained of the inspections. Prestige personnel informed U.S. EPA inspectors that short, unrecorded, baghouse inspections take place prior to daily operation. U.S. EPA inspectors stated that the emissions observed from the baghouse should be corrected.

DIGITAL SIGNATURES

Report Author: **VALERIA
APOLINARIO**

Digitally signed by VALERIA
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Date: 2022.10.13 09:14:32 -05'00'

Section Supervisor: **Brian Dickens**

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