



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

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Custom Hardwoods, Mansfield, Ohio

FROM: Natalie Schulz, Environmental Engineer
AECAB (MN/OH)

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

TO: File

BASIC INFORMATION

Facility Name: Custom Hardwoods

Facility Location: 220 Mansfield Industrial Parkway, Mansfield, OH 44903

Date of Inspection: March 29, 2022

EPA Inspector(s):

1. Natalie Schulz, Environmental Engineer
2. Patrick Miller, Environmental Engineer

Other Attendees:

1. Chris Fraley, Owner

Contact Email Address: customhardwoods1@gmail.com

Purpose of Inspection: Wood furniture coating inspection

Facility Type: Wood furniture manufacturing operations

Regulations Central to Inspection: National Emission Standards for Wood Furniture Manufacturing Operations (NESHAP Subpart JJ) and the VOC emission segments of the permit

Arrival Time: 10:00 a.m.

Departure Time: 10:40 a.m.

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet
- ☐ Small Business Resource Information Sheet not provided.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Chris Fraley unless otherwise noted.

Process Description:

Wood is cut and sanded before being assembled into wood furniture; the assembled pieces are then coated. A lacquer primer spray is used at the facility. It is the only coating used; several years ago, the facility also used paints and stains. The spray booth is subject to emission limits set in the permit and material usage limits set in the permit's segment on the NESHAP Subpart JJ obligations. The priming room has a filter system as required by the permit. There is an induction fan to draw in air through the filters.

Saw dust from the facility is compressed into blocks to be used and sold as fire starters. Waste wood material is also used to create the blocks. A baghouse, which is not required by the permit, is connected to the facility for dust collection.

Staff Interview:

The baghouse has not had maintenance completed since the facility opened in 1990. Acetone and primer usage is tracked internally and by a third-party. A third-party completes the required emission calculations, and compliance reports as required by the permit, and the material usage reports as required by the NESHAP Subpart JJ obligations in the permit.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

The filter system in the spray area, as required by the permit, was observed. The baghouse was observed; no dust or other particulate was seen near the baghouse or outside of the facility. Records for material use, emission calculations, and permit evaluation reports were requested. Records were not immediately available for review.

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:

- Permit evaluation reports (PERs) for the past three years
- Volatile organic compounds (VOC) emissions calculations for the previous twelve months
- Usage of coatings and gluing materials for the previous twelve months

DIGITAL SIGNATURES

Report Author: **NATALIE SCHULZ**  Digitally signed by NATALIE SCHULZ
Date: 2022.05.25 09:18:01 -05'00'

Section Supervisor: **Brian Dickens**  Digitally signed by Brian Dickens
Date: 2022.05.25 10:16:30 -05'00'