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

A642831838

| FACILITY: BUSKIRK LUMBER CO | | SRN / ID: A6428 |
|---|---|---|
| LOCATION: 319 OAK ST, FREEPORT | | DISTRICT: Grand Rapids |
| CITY: FREEPORT | | COUNTY: BARRY |
| CONTACT: Travis Kamps , Timber Buyer | | ACTIVITY DATE: 10/15/2015 |
| STAFF: Denise Plafcan | COMPLIANCE STATUS:  Compliance | SOURCE CLASS: |
| SUBJECT: | | |
| RESOLVED COMPLAINTS: | | |

**Denise Plafcan (DP) conducted an unannounced self-initiated inspection to determine compliance with state and federal Air Quality rules and regulations and PTI 533-89.  Prior to the inspection staff drove around the area and conducted surveillance for an extended period of time.  There was dust and wood scrap but it appeared to be limited to the specific area where they were stripping the bark.  There were some trailers in the back on the north side of the building and dust blowing was blowing in this area.**

**DP stopped in the office to find a contact person.  Those in the file were no longer at the facility. The receptionist stated that the contact person would be Travis Kamps, General Manager, but he was out of town.   The plant maintenance supervisor was available and was able to be the escort on the inspection.  DP provided a copy of the Environmental Inspection Brochure and in the closing meeting DP explained the issues that needed to be addressed, provided a Part 2 exemption handbook and suggest Travis call the AQ office when he returned.**

**When Travis called DP explained that the boiler permit (PTI 533-89) should be voided since the boiler and boiler building have been removed for years.  Travis sent the void request on October 22, 2015.  DP also requested a follow-up meeting to discuss the emissions at the plant and the use of possible exemptions.**

**November 13, 2015 DP met with Travis and conducted  a second physical site inspection.  Travis wondered why wood was considered an air contaminant and DP explained about PM-10 and PM2.5.  There was also a discussion of the exemptions and how they could be used and if an exemption wasn't appropriate then they would have to get a baghouse.  They also reviewed the Rule 290 exemption calculations to determine if that exemption would be appropriate (see calculation below).On the north side of the building Travis explained the collection system and during this inspection there were haulaway bins attached to the cyclone and all the vents on the bins were looped back into a closed loop system.  The trailers contained larger junks of wood and did not have a control system.  DP explained that they should try to maintain good housekeeping practices to minimize the fugitive dusts.**

In the closing DP and Travis again reviewed the Rule 201 exemptions and determined that the following exemptions would be appropriate:

Exemption Rule 285(gg) could be used for debarking, chipping, flaking, or hogging of the logs  or wood residue.

Exemption Rule 285 (l)(vi)(c) for all other carving, grinding, cutting , planning, sanding etc. However, they use a cyclone not a baghouse but the cyclone is a closed looped system so very little dust escapes.  If this exemption is not considered appropriate then using the calculation below they are at less than 500 pounds per month for compliance with the Rule 290 exemption

CALCULATIONS

Assumptions:

1.  Oregon DEQ and the industry estimates a log to be 4-tons/mbf
2.  MAERS emission factor for SCC3-07-008-02 to be 0.2 lb PM10/ton of log

3. PM10 is usually between half and all of the PM total according to Mark Mitchell MDEQ permit section as well as the Oregon DEQ.
4. The plant processes 9000mbf

$$9000 \text{mbf} \times \frac{8 \text{ tons log}}{\text{mbf}} \times \frac{0.2 \text{ lbs PM10}}{\text{ton of log}} \times \frac{2 \text{ lbs PM}}{\text{lb of PM10}} = \frac{2880 \text{ lbs of PM}}{12 \text{ months}} = \frac{240 \text{ lbs of PM}}{\text{month}}$$

Based on the observations made at the time of the inspection and subsequent calculations, the facility appears to be incompliance with the applicable AQD Rules and Regulations.

NAME _Denise Drafer_       DATE _12·4·15_       SUPERVISOR _____PA13_____