

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

B183832733

FACILITY: ROBBINS INC		SRN / ID: B1838
LOCATION: 445 GREENWOOD ST, ISHPEMING		DISTRICT: Upper Peninsula
CITY: ISHPEMING		COUNTY: MARQUETTE
CONTACT: Frank Misale , Safety Coordinator		ACTIVITY DATE: 12/23/2015
STAFF: Joe Scanlan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced inspection to determine compliance with PTI# 483-95.		
RESOLVED COMPLAINTS:		

**FACILITY:** Robbins, Inc. (Robbins Flooring)

**FACILITY REPRESENTATIVE:** Frank Misale, Safety Coordinator

**FACILITY LOCATION:** The facility is located in the city of Ishpeming, just west of downtown, in a commercial/industrial zone across the street from a residentially-zoned area.

**FACILITY & REGULATORY DESCRIPTION:** Robbins is a minor source with a general permit (PTI#483-95) which regulates VOC emissions from the dip tank used to coat hardwood flooring and also regulates the dust collection system. The mill operates an existing 8 MBTU boiler which utilizes wood waste as fuel that is regulated under the Boiler NESHAP.

This facility manufactures high-quality hardwood flooring assemblies for sports arenas, from high school to professional NBA facilities and the equivalent across the globe. The mill primarily uses maple but also oak in smaller number. Typically, rough cut planks are sourced locally and blanks are milled in-house. Lately however, a sister mill in White Lake, Wisconsin, has been providing an increasing amount of blanks, reducing the amount of wood waste being produced at Robbins. It is expected that eventually all blanks will be supplied to Robbins by the White Lake mill in the near future, which will in turn alter the operation of their wood waste-fueled boiler.

**INSPECTION:** On 12/23/2015 I conducted an unannounced inspection of Robbins, Inc. My contact at the facility was mill Safety Coordinator, Frank Misale. Mr. Misale stated that there had been no change in operations since the last inspection.

The plant has a dip tank, used only for maple, containing clear Woodlife F--a water repellent/preservative that provides anti-fungal protection as well. The storage tank for the Woodlife has a capacity of 6000 gallons, however it is typically maintained at half-capacity. Mr. Misale provided me with an email following the inspection stating the dip tank operated for 50.5 hours and used 2155 gallons in 2015. VOC's @ 6.47 lbs/gallon = 6.97 tons over a 12-month period. This is far below the permit limits for VOC emissions of 80.20 tons/year. Usage of the dip tank has diminished and it is used infrequently for special orders only.

The mill operates a pneumatic waste handling system for wood waste utilizing extensive ductwork throughout the facility, fed to a baghouse to collect the fines, while the remaining wood waste is conveyed to a cyclone on top of two storage silos via a closed loop conveying system. Large pieces of wood waste are separated out in the cyclone and ground in a hog for use as fuel in the boiler. The ductwork has a spark detection and extinguishing system (Grecon) which enables a fire suppression system. All 456 bags in the baghouse were changed in October of 2014 and are inspected weekly with enough spare bags on hand to for a full change. The system was in use at the time of inspection. Minor visible emissions and sawdust deposits were observed near the main exhaust outside the mill near the baghouse and cyclone.

Once the storage silos have filled, waste is sent to two semi trailers via a two duct system. This system was not in operation at the time of my inspection. During a previous inspection I noticed a pile of sawdust (~1 yd<sup>3</sup>) below the duct system where the ducts enter the trailers. I requested of Mr. Misale that he ensure the tightness of the seal where the duct enters the trailers prior to the next use, to which he agreed.

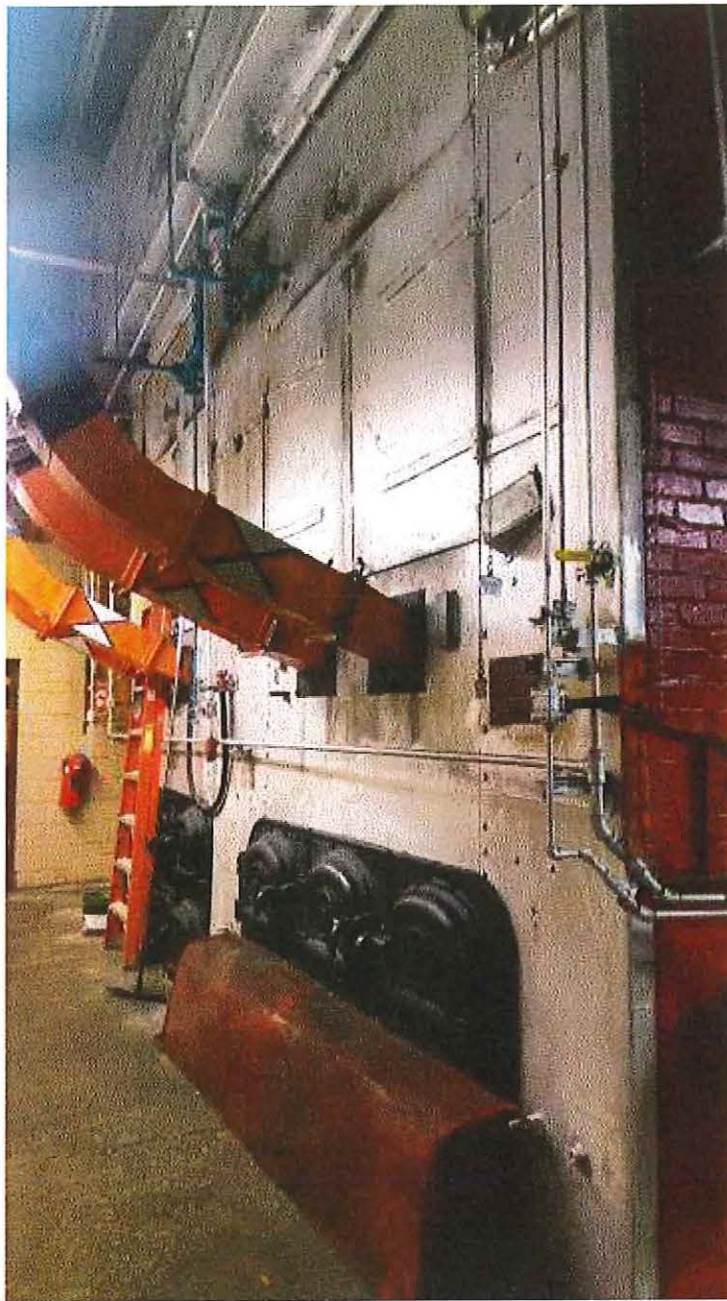
The facility has two 1947 Wickes boilers fueled by wood waste which utilize a single stack. As in the recent past, this business no longer kiln dries lumber so only one boiler is currently operational and is limited to providing steam heat for the offices and production areas/buildings. There are two larger, unheated outbuildings which are used primarily for cold storage of supply wood. The boiler was in operation during my inspection and I did not notice excessive opacity from the stack, however the day of inspection was very overcast with a low ceiling and in the recent past AQD staff have noticed possible excessive opacity from this facility in passing. The facility did have a fire in the stack during late winter of 2014-15. The single Wickes boiler in operation is considered an existing small (<10 MMBtu/hr) biomass-fired industrial boiler located at an area source of HAPs. Permittee is expected to comply with the Boiler NESHAP requirements for this existing boiler.

**SUMMARY:** I observed minor violations of the Air Pollution Control Rules and/or PTI #483-95 during my inspection. While no visible emissions from the wood waste handling system were observed leaving the facility property, Special Condition #23 of PTI #483-99 specifies that no visible emissions are acceptable. This is a concern that needs to be addressed and rectified.

Due to observations of possible opacity exceeding 20% from the boiler stack in the past (a potential Rule 301 violation), AQD staff will occasionally perform unannounced visible emission (VE) monitoring of stack opacity as time permits. Excessive opacity of boiler stack emissions is a concern that needs to be addressed and it is recommended that the facility conduct VE readings under varying boiler operating conditions to ensure stack opacity does not exceed a 6-minute average of 20% opacity. Mr. Misale is currently working with AQD staff to ensure the Wickes boiler is in compliance with the Boiler NESHAP.

District staff believe these issues can be resolved. No violation notice will be issued at this time.





**Image 1(R1)** : Dual 1947 Wickes Boilers, only one is operable. The single boiler operates on wood waste and generates 8 million BTU/hr.

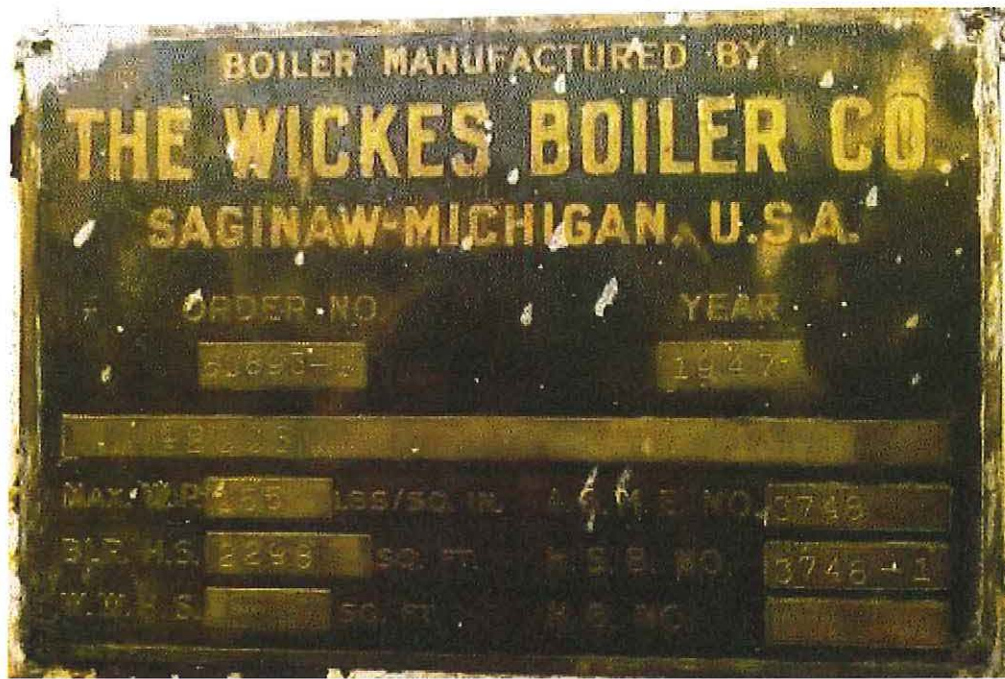


Image 2(R2) : Boiler plate





**Image 3(R3)** : Wood waste handling system cyclone and auger fed delivery system for the boiler.

NAME Joseph S. [Signature]

DATE 1/7/16

SUPERVISOR \_\_\_\_\_