

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

B183843261

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: 02/07/2018
STAFF: Sydney Bruestle	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection to verify compliance with PTI 483-95 and all other applicable state and federal air quality regulations		
RESOLVED COMPLAINTS:		

On February 7, 2017 I (Sydney Bruestle) completed an onsite inspection of Robbins Flooring located at 445 Greenwood Street Ishpeming, Michigan. While onsite I met with Frank Misale (Safety Coordinator) and Rodger Kipling (Plant Manager). Mr. Misale gave me a tour of the plant and an overview of the permitted processes.

#### Facility Description:

Robbins Flooring manufactures hardwood for flooring and portable basketball courts. Processes onsite include cutting and sanding of wood, a dip tank for insecticide application to flooring, a wood fired boiler for heating in cold months, and finishing processes (painting, sealing).

#### Permit to Install (PTI )483-95

Robbins Inc. currently holds one active permit with the Michigan Department of Environmental Quality, Air Quality Division. PTI 483-95 is an opt out permit for Volatile Organic Compounds (VOCs), it includes the dip coating tank and a baghouse attached to the wood working operations.

#### *Baghouse:*

There were no visible emissions from the baghouse duct work at the time of my inspection.

#### *Dip Tank:*

There is only one chemical used for coating in the dip tank, Woodlife F Clear Wood Preservative. The facility used 428 gallons of dip tank solution in 2016 and 973 gallons in 2017. The VOC content of Woodlife F Clear Wood Preservative (SDS attached) is 6.47 lbs VOC/gallon of coating. Based on this value 2016 VOC emissions were approximately 1.4 tons and 2017 VOC emissions were approximately 3.14 tons. These values are well below the permit limit for VOC emissions of 80.2 tons per year (Special Condition (SC) 13). The facility is in compliance with the material limit of 26000 gallons of coating per year (SC 14). The permit has a VOC limit of 36.5 pounds per hour, the facility was not tracking this value at the time of my inspection but hours of operation were being recorded(SC 13). Moving forward Robbins Inc. will calculate this on an annual basis through recording hours operation and coating usage for the dip tank.

Special Condition 15 requires the facility not to emit any Hazardous Air Pollutants (HAPs). I requested Safety Data Sheets (SDSs) for all coatings used at the facility (dip tank and spray booths). The SDSs are attached to the hard copy of this report. Woodlife F Clear Wood Preservative, used in the dip tank, contains 1% hexone (methyl isobutyl ketone), which is a HAP. Mr. Misale was unaware of this chemical as a HAP. He contacted the manufacturer KOP-COAT to figure out when the chemical was added to the coating. Kop-Coat informed him Hexone was always present in the coating, they only started listing the chemical on the SDS in 2015. I did not send a Violation notice for this. Mr. Misale plans to apply for a permit modification to continue using Woodlife F Clear Wood Preservative in the dip tank.

#### Method 9 Visible Emissions Test:

Robbins Inc. operates a wood fired boiler not covered by PTI 483-95 that was installed in 1947. The boiler

was converted from a high pressure boiler (150 lbs) to a low pressure boiler (15-20 lbs) in 2001. Before the conversion the boiler had a heat input capacity of 8 MMBTU/hr. The boiler does not meet exemption 282(b)iii. but is likely grandfathered from permitting.

282 (b) Fuel-burning equipment which is used for space heating, service water heating, electric power generation, oil and gas production or processing, or indirect heating and which burns only the following fuels:

(iii.) Wood, wood residue, or wood waste that is not painted or treated with wood preservatives, which does not contain more than 25% plywood, chipboard, particleboard, and other types of manufactured wood boards, that is not contaminated with other waste materials, and the equipment has a rated heat input capacity of not more than 6,000,000 Btu per hour.

Though the boiler may not require a permit, it is subject to all other state air quality regulations, including the rule 301 opacity limit of 20% (6 minute average). There was significant white smoke coming from the stack during my inspection. While onsite I performed an EPA method 9 VE reading (test report attached to the hard copy). I observed a 6 minute average opacity of 32.5%, the boiler was in violation of rule 301. I sent the facility of violation notice on February 9, 2018.

At the time of my inspection Robbins Inc. was not in compliance with PTI 483-95 or State Air Quality Rule 301. I will assist Mr. Misale with modifying PTI 483-95 and await the facility's response to the violation notice sent on February 9th.

NAME



DATE

02/20/18

SUPERVISOR

