

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B183865336

FACILITY: ROBBINS INC		SRN / ID: B1838
LOCATION: 445 GREENWOOD ST, ISHPEMING		DISTRICT: Marquette
CITY: ISHPEMING		COUNTY: MARQUETTE
CONTACT: Frank Misale , Safety Coordinator		ACTIVITY DATE: 11/01/2022
STAFF: Joe Scanlan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced inspection to determine compliance with PTI 483-95		
RESOLVED COMPLAINTS:		

REGULATORY AUTHORITY

Under the Authority of Section 5526 of Part 55 of NREPA, the Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.

PROCESS DESCRIPTION

Robbins manufactures high-quality hardwood flooring assemblies for sports arenas, from high school to professional NBA facilities and the equivalent across the globe. Processes onsite include cutting and sanding of wood and finishing processes of painting and sealing (EUCOATING). The facility formerly operated a dip tank (EUDIPTANK) containing a wood preservative/insecticide; however it is no longer in use. The mill primarily uses maple but also oak in smaller numbers. Flooring blanks are provided by a sister mill in White Lake, Wisconsin.

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. Once the storage silos have filled waste is sent to two sealed semi-trailers via a two duct system. Large pieces of wood waste are separated out in the cyclone and sold as fuel. The ductwork has a Grecon spark detection and extinguishing system which enables a fire suppression system.

REGULATORY ANALYSIS

The facility is a synthetic minor source and operates under Permit to Install (PTI)483-95. PTI 483-95 is an opt out permit for Volatile Organic Compounds (VOCs), it includes a dip coating tank and a baghouse attached to the wood working operations.

EMISSIONS

VOC emissions from painting/sealing wood product and the preservative in the dip tank, and PM emissions (wood fines) from manufacturing processes.

EMISSIONS REPORTING

This facility is a synthetic minor source and is required to report annual emissions to MAERS for EUCOATING and EUDIPTANK. For 2021, the company reported a throughput of 550 gallons paint,

sealer, finish and mineral spirits. 2019 was the last year the company reported throughput for EUDIPTANK, reporting a throughput of 1739 gallons of Woodlife F Clear Wood Preservative. The company discontinued use of the dip tank in 2020 and has reported the emission unit as not operating with zero throughput since then.

COMPLIANCE

From 1947 until 2018, the facility operated two wood-fired Wicks boilers that were not covered by PTI 483-95 due to the age of the emission units. During the previous inspection, AQD district staff observed excessive opacity coming from a boiler stack. After completing a Method 9 Visible Emissions test, AQD district staff issued a Rule 301 violation for opacity greater than 20% based on a 6-minute average.

In 2019, the facility discontinued use of and removed the antiquated wood boilers. The boilers were replaced with 15 individual Modine PTS/BTS separated combustion gas-fired unit heaters. These models do not exceed 400k Btu/hr, therefore they are exempt for permitting under Rule 282(2)(b)(i).

INSPECTION

On November 1, 2022, AQD district staff (Joe Scanlan) conducted an unannounced onsite inspection of Robbins Flooring. I met with Safety Coordinator Frank Misale upon entering the main office. Mr. Misale gave me a tour of the plant exterior and an overview of the permitted processes.

Baghouse

Since the last inspection, upgrades have been made to the cyclone/baghouse air handling system. A return air system with spark detection has been installed exiting the baghouse, returning the filtered air back to the interior atmosphere of the plant. Because of these improvements, Special Conditions (SC) 23, 24, 25 and 28 of PTI 483-95 are no longer applicable.

SC 26 - Wood Fines are collected in an enclosed bin at the base of the baghouse, satisfying SC 26.

SC 27 – The baghouse is installed and operating properly, satisfying SC 27.

The 456 bags in the baghouse are inspected weekly and the facility has a supply of spare bags on hand.

There were no visible emissions from the baghouse, cyclone, semi-trailers or associated duct work and the areas surrounding the units were very clean during the inspection.

Dip Tank

Use of the dip tank has been discontinued since 2020. There was only one chemical used for coating in the dip tank, Woodlife F Clear Wood Preservative. Access to the dip tank and the storage tank has been restricted to all employees except for management; locks have been placed on doors to both areas. No Woodlife is left in the dip tank, however the storage tank still has a few dozen gallons. At the time of the inspection, the facility has not been able to secure a company for proper transport of the remaining Woodlife to a disposal facility but is continuing to

explore options. I explained to Mr. Misale that to properly decommission the dip tank as an emission unit, the facility must remove the feed pipe from the storage tank to the dip tank.

CONCLUSION

AQD district staff did not observe any violations of the Michigan Air Pollution Control Rules and the facility appears to be in compliance with PTI 483-95.

NAME Joseph Scandone

DATE 11/23/2022

SUPERVISOR Michael Kaplan