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

B709956666				
FACILITY: CONNOR AGA SPORTS FLOORING LLC		SRN / ID: B7099		
LOCATION: 251 INDUSTRIAL PARK RD, AMASA		DISTRICT: Marquette		
CITY: AMASA		COUNTY: IRON		
CONTACT: COLLEEN STROMBERG , SAFETY COORDINATOR		ACTIVITY DATE: 12/15/2020		
STAFF: Joe Scanlan	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT		
SUBJECT: Announced inspection to determine compliance with PTI#'s 570-86, 549-90, 216-93, 282-93				
RESOLVED COMPLAINTS:				

DESCRIPTION: Connors Sports AGA manufactures various styles of wood flooring including professional sports flooring, sub flooring, and parquet flooring. The facility is located in a heavily wooded area 2.75 miles Southeast of the community of Amasa in Iron County.

REGULATORY ANALYSIS: Large scale sawing, sanding and grinding are the major processes onsite. There are two wood working/milling buildings onsite, each with processes venting to a baghouse. There is a hopper collection system to collect scrap wood for two wood fired boilers. This hopper is also attached to a baghouse. The facility operates the boilers continuously, year-round. The facility currently operates under 5 PTIs: 570-86, 549-90, 216-93, 282-93 and 555-95. Regulatory details for each permit and the processes covered are detailed below.

INSPECTION: I performed an inspection at Connors AGA Sports Flooring on December 15, 2020. Upon my arrival I met Mr. Clement Mondino (Quality, Process & Safety Engineer). Mr. Mondino introduced me to Mrs. Colleen Stromberg, Safety Coordinator. Mrs. Stromberg gave me a tour of the facility and showed me the various processes and control devices covered by the permits.

PTI 570-86

This permit covers Wood Boiler #2 and the gray baghouse. The boiler only burns wood and is equipped with a Breslove regenerative fly ash separator and baghouse to collect the fly ash. The facility monitors the pressure drop of the baghouse daily and changes the bags as necessary, at least once per year. At the time of my inspection the baghouse appeared to be operating properly, there were no visible emissions coming from the unit. The opacity of the boiler was below the permit limit of 20%.

PTI 549-90

This permit covers the green Silo Baghouse (Carter Day 144RJ96) which collects particulate matter generated from processing dry hard maple: planer shavings, hogged wood scrap, and sawdust from the milling machine area. The baghouse has 144 bags (96" long) and pulses jets of air to periodically clean the bags. The facility monitors the pressure drop of the baghouse daily. At the time of my inspection the pressure drop was 2.4 inches of water column and the baghouse appeared to be operating properly. There were no visible emissions from the unit and the opacity was below the limit of 10%.

PTI 216-93

This permit covers the blue Plant Baghouse (Carter Day 144RJ84) which collects wood shavings and particulate matter from the subflooring machining area/Parquet flooring area and transfers them into a silo. This baghouse also has 144 bags (84" long) and pulses jets of air to periodically clean the bags. The collected biomass is transferred from the silo into the wood fired boiler. The facility monitors the pressure drop of the baghouse daily. At the time of my inspection the pressure drop read 2.3 inches of water column on the blue baghouse. The baghouse appeared to be operating properly, there were no visible emissions from the unit and the opacity was below the permit limit of 10%.

PTI 282-93

This permit covers Wood Boiler #1 and a multi-clone ash collector. The boiler is a low-pressure Kewanee Type C boiler (Model 7L85) and is pneumatically fed hogged wood waste. The boiler typically

burns up to 300 pounds/hr of wood waste. A multi-clone collects ash from the boiler. At the time of my inspection there were no visible emissions from the multi-clone and the boiler opacity was below the permit limit of 20%.

PTI 555-95

This permit covers Boiler number 3, which was never installed, and a wood preservative dip tank. The facility tracks the amount of solution used each month in the dip tank and calculates Volatile Organic Compound (VOC) emissions annually. The facility calculates Hazardous Air Pollutant (HAP) and VOC emissions at the end of each month and tracks the emissions over a 12-month rolling time period using emission factors found on the most up to date SDS for the wood preservative. The facility will also track and record preservative usage in gallons per month and gallons per year as required by the permit. VOC and HAP emission rates are well below the permit limits (VOC limit: 88.4 tpy 9.8 tons/month and HAP limit: 10 tons/year individual HAP 25 tons/year HAPs combined). Dip tank usage records for 2019 are below:

- 01/01/19 2,289
- 02/01/19 2,289
- 03/01/19 2,289
- 04/01/19 2,289
- 05/01/19 2,289
- 06/01/19 2,289
 07/01/19 2,220
- 07/29/19 550 gal. delivered
- 08/01/19 2.020
- · 09/01/19 2.020
- 10/01/19 2,154
- 11/01/19 1,885
- 12/01/19 1,885
- 01/01/20
 1,885

Beginning inventory + Purchases – Ending Inventory = Gal. used

2,289 gal (1/1/2019) + 550 gal purchased - 1,885 gal (1/1/2020) = 954 gal used

Woodlife VOC Content = 741 g/l

1566 g/l x 3.7854 l/g = 5,927.93 g VOC/gal

5927.93 VOC g/gal x 0.002205#/g = 13.07 # VOC/gal

Annual VOC's

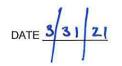
Woodlife used 954 gal x 6.18 VOC/gal = 5895.72 lbs. VOC/2000=tons

2.948 Tons VOC Emissions for 2019

A copy of the wood preservative Woodlife SDS is on file.

SUMMARY

At the time of my inspection the facility is in compliance with active PTIs and all other applicable state and federal air quality regulations.



SUPERVISOR

Connor Sports Flooring, Inc. 2019 Woodlife Use age And VOC Content Woodlife Storage and Dip Tank Air Use Permit No. 555-95

Date	Inventory(gal)	Woodlife Purchaced (gal)
01/01/19	2,289	
02/01/19	2,289	
03/01/19	2,289	
04/01/19	2,289	
05/01/19	2,289	
06/01/19	2,289	
07/01/19	2,220	
07/29/19	550 gal. deliver	red
08/01/19	2,020	
09/01/19	2.020	
10/01/19	2,154	
11/01/19	1,885	
12/01/19	1,885	
01/01/20	1,885	

01/01/19 2,289 + 550 - 1,885 = 954 gal used

Beginning inventory + Purchases – Ending Inventory = Gal. used

Woodlife VOC Content 741g/l

1,566g/l x 3.7854 l/g = 5,927.93 g VOC/gal 5,927.93 VOC g/gal x 0.002205#/g = <u>13.07 # VOC/gal</u>

Annual VOC's

Woodlife used 954 gal. x 6.18 VOC/gal = <u>5,895.72 lbs.</u> VOC/2000=tons

Or 2.948 Tons VOC Emissions