

## HARDWOODS OF MICHIGAN, FUGITIVE DUST CONTROL PROGRAM

Consistent with Hardwoods of Michigan's desire to maintain a "good neighbor" policy with residents of the community adjacent to our Clinton facility, the following Fugitive Dust Control Program has been developed and implemented.

### 1. Roadways and Drive Areas

Water is applied during the dry weather season as frequently as required to minimize the possibility of windborne dust leaving the property, in addition to assuring satisfactory working conditions for Hardwoods of Michigan personnel and equipment. Hardwoods' personnel will continuously monitor dust generation and determine the need for watering based on weather conditions, the absence of surface ground moisture, and the size and density of dust plumes created by vehicle activity. Any observable dust clouds exiting on the site will trigger a response by the Operations Manager and water application will be scheduled as appropriate.

### 2. Concrete Areas

There are several concrete areas throughout the facility used for various purposes. To limit the potential of windborne dust from these surfaces the Operations Manager will inspect and have these areas cleaned as necessary.

### 3. Log and Lumber Storage Areas

Lumber storage areas are limestone covered low traffic areas and represent little or no potential for fugitive dust generation. The access to lumber storage areas is addressed in Paragraph 1.

Log storage areas are more than 200 feet from the property line and screened from residential areas by large processing buildings. The log yard is raked on an ongoing basis to prevent the accumulation of bark and deleterious material. Access to the log yard is addressed in Paragraph 1. A water application incorporating a moveable irrigation spraying system is available to control dust; this will be used at the discretion of the Operations Manager

### 4. Storage Piles

Chips, green sawdust, and bark are stored in several piles throughout the facility. The distance to the pile from the discharge of the conveyor is kept to a minimum and chutes are incorporated where necessary to reduce wind current at the discharge point. Because the material is green (nearly half water), dust does not easily become airborne; the addition of water tends to form a crust and contains the dust.

With one exception storage piles do not exceed a volume of 55 cubic yards. The exception is the primary bark pile located in the log yard. Bark is accumulated throughout the month and sold & shipped out once a month. Hardwoods' personnel monitor storage pile activity and take appropriate corrective action; either operational modification or remedial dust suppression incorporating water spray.

Please note that as of 9/1/2023, all sawmill operations have ceased, there is no more sawdust/mulch/bark being produced at the sawmill.

## 5. Material Handling Equipment

All material handling equipment is within the confines of buildings, except the following:

- A. The dry sawdust system is a highly efficient self-cleaning baghouse with a closed loop transfer system to the silo. The system is checked daily for seal integrity at equipment and throughout the ductwork, primarily from a fire safety standpoint. Weekly cleaning and inspection of this area to be implemented and documented effective 12/3/2023.
- B. Green sawdust is transferred from the mill in open top trailers to the green sawdust to the green sawdust silo. A building encloses the dump pit and a totally enclosed elevator and conveyor transfer sawdust from the pit to the silo. No more green sawdust is being produced as of 9/1/2023.
- C. Totally enclosed screw conveyors transfer both dry and green sawdust from the respective silos to the boiler. The boiler maintains a negative pressure throughout the system, which minimizes dust leakage.
- D. The mill green sawdust collection system is a complex series of drag conveyors servicing numerous areas within the building. The primary exit point discharges the sawdust, a short drop into an open top trailer. The secondary system discharges into a pile located in a three-sided bay to eliminate airborne contaminants.
- E. The mill chip system conveys sized and screened green wood chips via an enclosed conveyor to a chip storage bin.
- F. The mill bark handling system conveys bark via a drag chain to a small storage pile; a short drop and windscreen minimize airborne contaminants. Bark is transferred to the primary storage pile via loader when surface winds are less than 30 m.p.h

Note: Points B, C, D, E, F above are not in use as of mill idling 9/1/23.

## 6. Summary

The Operations Manager is responsible for the enforcement of all policies concerning site housekeeping and has the authority to direct production departments in matters affecting airborne contaminants and other factors that could project an adverse of Hardwoods of Michigan's commitment to being a good neighbor in the community. This program is consistently changing to meet the needs of our facility and to continue our obligation to the DNR.