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

N093542977

FACILITY: MIDWEST TIMBER INC		**SRN / ID:** N0935
LOCATION: 69745 KRAUS RD, EDWARDSBURG		**DISTRICT:** Kalamazoo
CITY: EDWARDSBURG		**COUNTY:** CASS
CONTACT: Ben Borgic , Manager		**ACTIVITY DATE:** 01/03/2018
STAFF: Amanda Chapel	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MINOR
SUBJECT:		
RESOLVED COMPLAINTS:		

On January 3, 2018, AQD's Amanda Chapel (staff) conducted an unannounced inspection of Midwest Timber (facility) located in Edwardsburg, Cass County. The purpose of this inspection was to determine compliance with Permit to Install (PTI) 992-84 to pressure treat lumber with waterborne preservative and chromated copper arsenate (CCA) which has since been changed to copper azole by the facility, PTI 992-84A to pressure treat lumber with waterborne preservative and chromated copper arsenate (CCA), and all applicable state and federal air regulations. The following will summarize facility operations and compliance status.

I arrived at the facility at 10:40 am. There were no visible emissions or odors detectable from the road leading up to the facility. I parked and entered the main entrance. I introduced myself to the secretary at the front desk, presented my inspection credentials, informed her that I was there to complete an unannounced air quality inspection, and asked for Mr. David Biek or whoever handled the environmental operations at he facility. Mr. Ben Borgic retrieved me from the entrance and we went to his office. We sat down and I explained that I was there to conduct an air quality inspection and that I would like to take a tour of the facility and review the required records. Mr. Borgic was unaware the facility had air permits.

The last inspection of the facility was on January 29, 2008 and the facility was in compliance. There are about 45 staff that work 1 shift from 8am to 4:30 pm Monday to Friday and occasional weekends. The facility has two boilers on site, but one is not in service. The boiler 1 which is not in service is located in Plant 2. It is a natural gas boiler with a 5175 MBtu/hr capacity which had a date of 1967 on the plate. It was last inspected and run in 2010. Boiler 2 is located in Plant 3. It is an Osage boiler with a date of 1995 and 2448 Btu/hr capacity. This is exempt under Rule 282(2)(b)(i). Both of these were observed during the facility tour. There are no emergency generators or cold cleaners on site.

I explained to Mr. Borgic there are records requirements with PTI 922-84A which covers Plant 1. Plant 2 and 3 are covered under PTI 992-84. Plants 2 and 3 have switched from using CCA to using copper azole in 2003 when more stringent regulations on CCA were passed. In a previous inspection report from 2005, it was determined that switching from CCA to copper azole does not constitute an appreciable change in quality or appreciable increase in quantity of emissions since it is less toxic than CCA. Mr. Borgic was able to provide me the SDS for Wolman E Copper Azole, Wolmanac Concentrate 60% CCA. He was also able to provide me with records for charges processed monthly, in board feet, for all Plants. The largest amount of board feet processed in Plan 1 was in June 2017: 124,224 bf 40 ply, 1,265,570 bf 60, and 80,944 bf 60 ply totaling 1,470,738 board feet processed for the month.

On the facility tour, we first went to Plant 1, which was not operating. First, the wood is loaded into the pressure vessel. Next, they draw a vacuum which draws out excess air from the wood. They then fill the tanks with liquid by submersion and pressure of about 150-165 psi. This is then drained, and another vacuum is pulled to draw out excess liquid. The wood is then removed to a drip pad. The excess liquid flows into a floor drain to be recycled into the effluent tank. There are about 8-9 tanks on site. The process was changed slightly in 2000. What was formerly used as a combination tank is now used as work tanks. The facility now uses pressure pumps, instead of an air/liquid separator, to force the liquid into the cylinder and then force the liquid back into the work tank in a closed loop system. There is no outdoor venting. All permitted equipment is still installed and operating at the facility. Plant 1 is fully enclosed. The cylinder is loaded from both sides and it takes about 1-1.5 hours to treat the wood.

Plants 2 and 3 operate in the same fashion as plant 1 and were operating during the inspection. Plants 2 and 3 use Copper Azole instead of CCA. Both boilers and tanks were observed in plant 2 and 3. In plant 2, all four tanks are insulated. The tanks were insulted in anticipation of treating the lumber with a fire retardant. I advised Mr. Borgic that if the facility does begin this new treatment process, to contact the

AQD to update their permits. Most of the production is done in plant 3. There are 3 tanks and a concentrate tank.

When the tour concluded, I thanked Mr. Borgic for the records and tour and left the facility around 12:00 pm. The facility appears to be in compliance with the PTIs 992-84 and 992-84A. If the facility does end up removing the former combo tank and air/liquid separator, the permit may need to be updated. If the facility chooses to pursue treating the wood with fire retardant, they also may need to update their permit.

NAME Aaron Clapell DATE 1/8/18 SUPERVISOR MB 1/10/2018