

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N362449435

FACILITY: Newberry Wood Enterprises		SRN / ID: N3624
LOCATION: 7300 CR 403 (Miller Road), NEWBERRY		DISTRICT: Upper Peninsula
CITY: NEWBERRY		COUNTY: LUCE
CONTACT: DAVID DISMUKE , OPERATIONS MANAGER		ACTIVITY DATE: 07/02/2019
STAFF: Michael Conklin	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Inspection to determine compliance with state air quality rules and federal regulations.		
RESOLVED COMPLAINTS:		

Facility: Newberry Wood Enterprises (SRN: N3624)

Location: 7300 N CR 403, Newberry, MI 49868

Contact: Dave Dismuke, Manager/Owner, 906-293-3131

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.

Facility Description

Newberry Wood Enterprises (NWE) is a wood product manufacturer located in Newberry, MI. The company produces snow fences constructed out of Aspen pickets and galvanized wire. The facility consists of machines for sawing, chipping, assembly, and staining. A pneumatic transfer system collects and routes wood waste from processing operations to uncovered piles on the backside of the facility. The table below summarizes the emission units at this source.

Emission Unit ID	Description
EUPNEUMATICLINE	A pneumatic transfer system that transports wood waste, collected from process operations, to outside of the facility. Emissions are uncontrolled.

Emissions

Wood product manufacturing involves the generation of sawdust, planer shavings, and/or sander dust which contribute to levels of atmospheric PM and PM10. Cyclones or baghouses can act as capture/collection systems for air pollution control and product recovery by separating wood residue from the airstream of pneumatic handling systems.

Emissions Reporting

The facility is neither a major source for regulated air pollutants nor subject to any federal New Source Performance Standards (NSPS), and thus is not required to report its annual emissions to Michigan Air Emissions Reporting System.

Compliance History

The facility was last inspected in 2016 and found to be in compliance with all state air quality rules and federal regulations. In 1992, the facility was issued a violation notice for Rules 201 and 301. A cyclone for the collection of wood residue from woodworking operations was installed without receiving a Permit To Install (PTI), and sawdust was being conveyed into piles without an enclosure that was causing heavy emissions of fine particles. The facility came back into compliance by receiving PTI No. 1036-92. This permit was later voided on March 29, 2016, for the cyclone being no longer at the source. According to the previous inspection report, a fire occurred at the facility several years ago damaging much of the equipment. The facility was rebuilt and the cyclone was no longer at the site. However, this PTI should not have been voided because in the special conditions (SC), SC 18 requires that the woodworking equipment not be operated unless the cyclone dust collector is installed and operating properly.

Regulatory Analysis

NWE currently does not hold any PTIs. NWE is considered an area source for hazardous air pollutants (HAP) because the potential to emit of any single HAP is less than 10 tpy and aggregate HAP emissions are less than 25 tpy. The facility is also considered a true minor source for all regulated air pollutants because the facility's potential-to-emit is less than 100 tpy for each regulated air pollutant. The facility does not contain any equipment or processes that are subject to federal New Source Performance Standards (NSPS) or National Emissions Standards for Hazardous Air Pollutants (NESHAP).

Inspection

On July 2, 2019, I (Michael Conklin) of the Air Quality Division conducted an unannounced inspection at Newberry Wood Enterprises in Newberry, MI. I arrived at the facility and met with mill worker, Shawn Burto. I explained to Mr. Burto that the purpose of the inspection was to ensure compliance with Michigan's Air Pollution Control Rules.

We began the inspection by touring the facility and observing the different wood processing operations. The process begins with incoming logs going through the de-barker and then proceeding to a head saw, trim saw, and band saws. The head saw cuts the logs into cants, the second circular saw cuts the cants into two 4ft cants, the cants are then further processed through one of two band saws to produce fence pickets. Snow fences are assembled with strands of galvanized wire and then dipped into a solution of iron oxide to provide a red stain. Mr. Burto stated that about 30 – 35 cords of aspen are processed per day. This is roughly equivalent to 67.5 – 78.75 tons based on a cordwood conversion factor of 2.250 cords per ton for Aspen (Timber Sale Handbook 2461, State of Wisconsin Department of Natural Resources). Mr. Burto also stated that the facility normally operates four days per week.

We next went outside the facility to observe the transfer points of the wood waste collection system. There are two emission points out the back of the facility. One is for wood residue collected from the head saw, and the other is for wood residue collected from the trim and band saws. The emission points out the back of the facility are uncontrolled. Large piles of wood residue were observed behind the facility from the emission/transfer points of the collection system.

EUPNEUMATICLINE

The pneumatic line removes wood waste from each production operation point and transfers it outside of the facility. The airstream through the pneumatic line is uncontrolled with wood residue being blown into piles directly behind the building. During the time of the inspection, none of the saws were operating and thus the pneumatic transfer system was not operating. On the backside of the facility, large piles of wood residue can be observed from the two emission points. PM emissions occur at several points in the transfer system: the blowing of the material out into piles, wind disturbances, and during loadout from the piles. Mr. Burto stated that the material is collected and shipped off-site to be sold as boiler fuel for paper plants.

In many wood manufacturing operations, wood waste is collected and routed through a pneumatic line with emissions controlled by a fabric filter collector. Wood residue collected at the bottom of the bin is then conveyed in an enclosed system to a container, such as trailers or silos. Since NWE contains equipment with emissions externally vented and does not utilize a fabric filter collector for control, this is a Rule 201 violation and will require a PTI for these operations. A violation notice will also be issued for a Rule 301 violation from having excessive fugitive dust from wood residue being dropped into piles causing heavy emissions of fine particles.

Compliance

Based on this inspection, Newberry Wood Enterprises is not in compliance with state air quality rules and federal regulations.

NAME Michael Conklin

DATE 7/22/2019 SUPERVISOR EFL

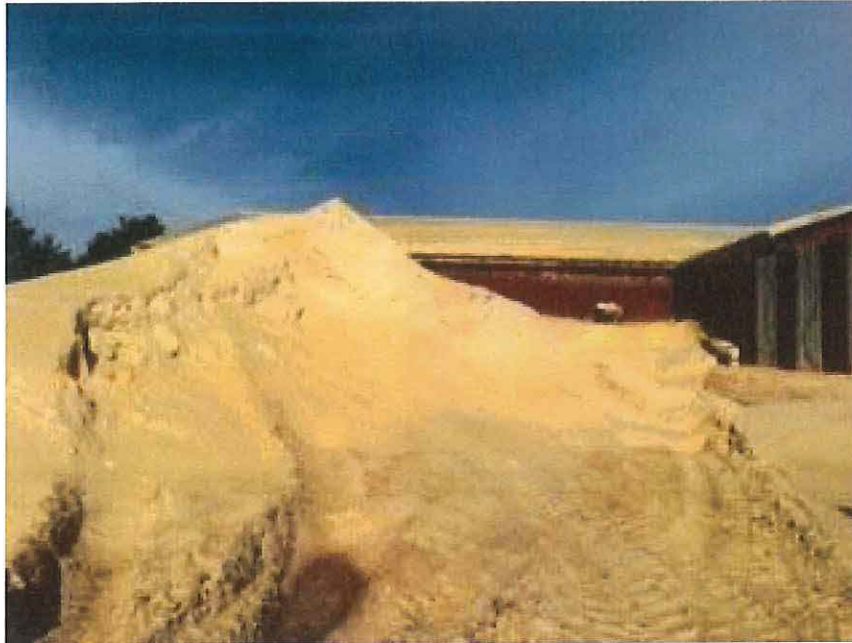


Image (1): Collection points of wood residue

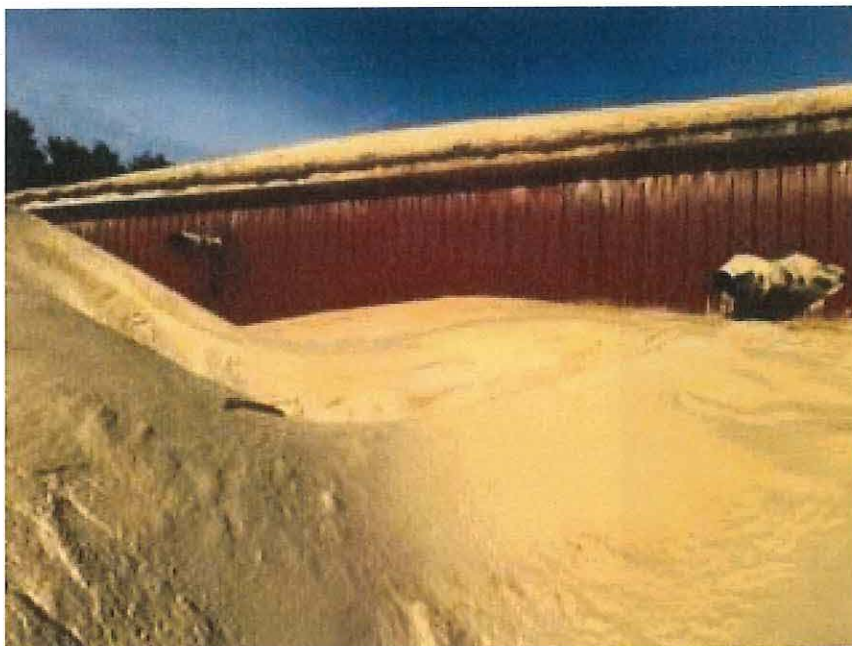


Image (2): Externally vented emissions



Image (3): Storage piles of wood residue to be shipped off-site

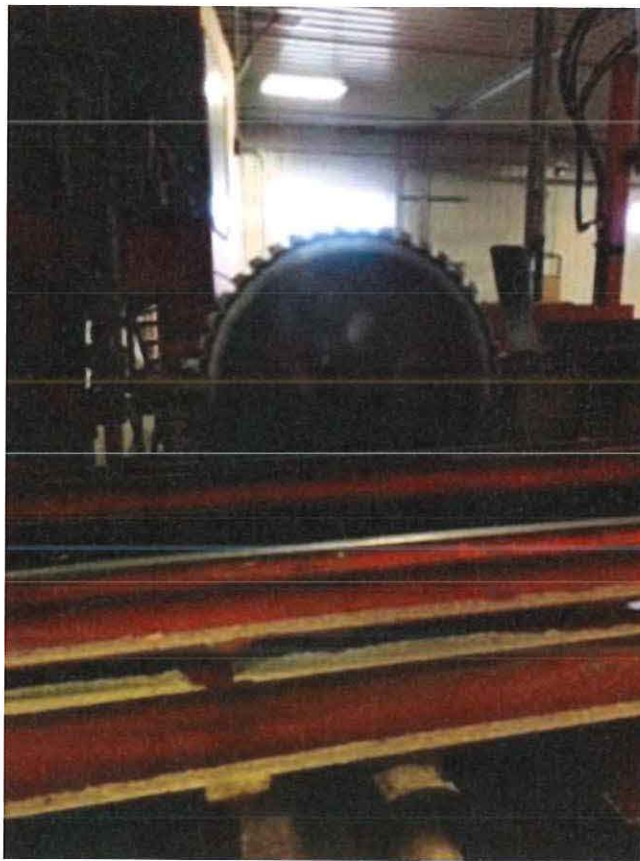


Image (4): First circular saw of milling operation

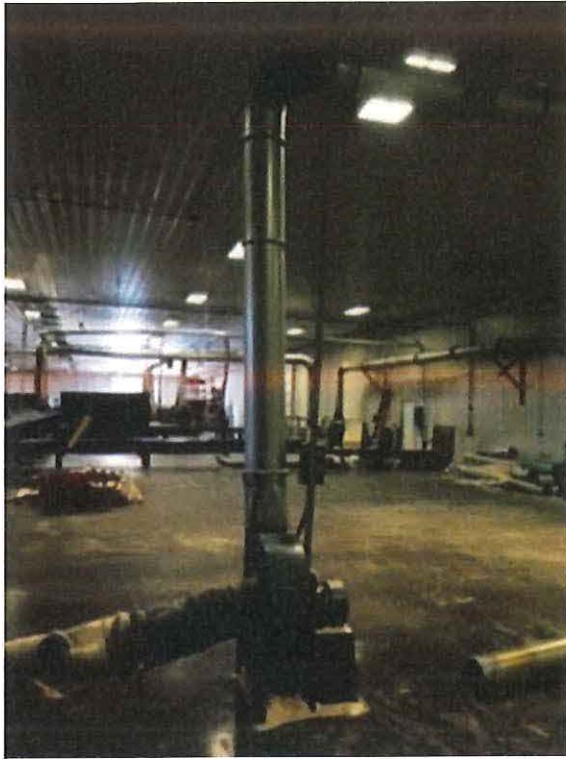


Image (5): Transfer of waste wood residue from head saw



Image (6): Transfer of waste wood residue from band and trim saws



Image (7): Chipper machine

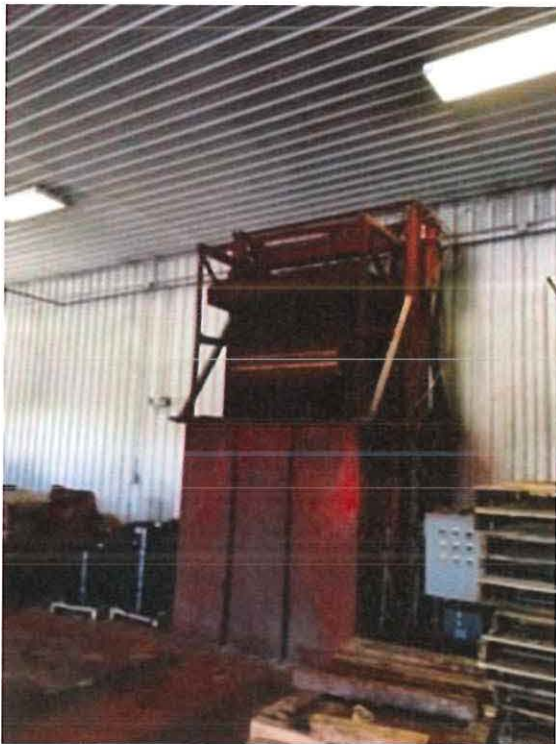


Image (8): Snow fence stained in iron oxide solution