

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

N759448880

FACILITY: BANKS HARDWOODS INC		SRN / ID: N7594
LOCATION: 6946 COUNTY ROAD 392, NEWBERRY		DISTRICT: Upper Peninsula
CITY: NEWBERRY		COUNTY: LUCE
CONTACT: JAMES F CLARKE , CFO		ACTIVITY DATE: 05/03/2019
STAFF: Michael Conklin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Self initiated inspection to determine compliance with new PTI (92-06A).		
RESOLVED COMPLAINTS:		

Facility: Banks Hardwoods, Inc. (SRN: N7594)
Location: 6946 County Road 392, Newberry, MI
Contacts: Jim Clarke, President, 269-483-2323 x212
Jake Holcomb, Plant Manager

Regulatory Authority

Under the Authority of Section 5526 of Part 55 of NREPA, The Department of Environmental Quality 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

Banks Hardwoods is a wood processing company that produces hardwood lumber products. The company was founded in 1985 and is based out of White Pigeon, Michigan with additional milling facilities in Menominee, WI and Newberry, MI. Green lumber is purchased, planned, kiln dried, and sorted to customer specifications. Hardwoods processed include Maple, Red Oak, Cherry, Hickory, Ash, White Oak, and a variety of other domestic species.

The Newberry, MI facility is one of three processing mills. Operations include a wood fired boiler to provide steam for kiln drying, a sawdust storage silo for the boiler, a green lumber cutting saw, seven existing and three proposed new steam heated wood drying kilns, dried lumber planning and sawing, and two coating areas to apply marking paint to finished lumber.

Emission Units

The table below summarizes the emission units at this source.

Emission Unit ID	Description
EU-GREENCUT (Removed)	Green lumber drop saw trimmer controlled by a bag filter collector.
EU-SILO	Sawdust storage silo for Boiler #2 controlled by a cyclone collector.
EU-PLANER	Lumber saws and planning operations controlled by a bag filter collector.
EU-BOILER2	23.89 MMBTU per hour wood-fired boiler. Emissions are controlled by a multicyclone.
EU-KILN1	Indirect steam-heated lumber drying kiln. Charge capacity of 50 MBF. MBF is equivalent to one thousand board feet.
EU-KILN2	Indirect steam-heated lumber drying kiln. Charge capacity of 20 MBF. MBF is equivalent to one thousand board feet.
EU-KILN3	Indirect steam-heated lumber drying kiln. Charge capacity of 50 MBF. MBF is equivalent to one thousand board feet.
EU-KILN4	Indirect steam-heated lumber drying kiln. Charge capacity of 40 MBF. MBF is equivalent to one thousand board feet.

EU-KILN4	Indirect steam-heated lumber drying kiln. Charge capacity of 40 MBF. MBF is equivalent to one thousand board feet.
EU-KILN5	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF. MBF is equivalent to one thousand board feet.
EU-KILN6	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF. MBF is equivalent to one thousand board feet.
EU-KILN7	Indirect steam-heated lumber drying kiln. Charge capacity of 60 MBF. MBF is equivalent to one thousand board feet.
EU-KILN8 (Not yet installed)	Indirect steam-heated lumber drying kiln. Charge capacity of 55 MBF. MBF is equivalent to one thousand board feet.
EU-KILN9 (Not yet installed)	Indirect steam-heated lumber drying kiln. Charge capacity of 55 MBF. MBF is equivalent to one thousand board feet.
EU-KILN10 (Not yet installed)	Indirect steam-heated lumber drying kiln. Charge capacity of 55 MBF. MBF is equivalent to one thousand board feet.
EU-COAT1	Coating area to spray apply identifying board paint.
EU-COAT2	Coating area to spray apply identifying board paint.

Emissions

The facility is a true minor source for criteria pollutants and hazardous air pollutants (HAPs). No equipment on-site is subject to the New Source Performance Standards and actual emissions from the facility do not exceed the MAERS Reporting Thresholds. Thus, this source is not required to report its emissions to MAERS.

Compliance History

The facility was last inspected on 6/30/2014 under PTI No. 92-06. A violation notice was issued on 7/18/2014 for not providing records of fuel usage and lumber dried in the kilns. This VN was resolved on 7/21/2014 with the facility providing the required records and being in compliance.

Inspection

On 5/3/2019, I (Michael Conklin) conducted a self-initiated inspection on Bank Hardwoods in Newberry, MI. I arrived at the facility at 11:30 AM and met with plant manager, Jake Holcomb. I explained to Mr. Holcomb that the purpose of the inspection was to ensure compliance with the facility's Permit to Install (92-06A). The inspection consisted of reviewing permitted processes and equipment, and then reviewing records that are maintained on-site. A follow up email was sent to Mr. Clarke requesting records not held on-site for the permitted emission units.

Regulatory Analysis

inspection, if visible emissions were observed, maintenance needs, and who the inspection was performed by. Mr. Clarke also provided records of past 12 months showing compliance with SC VI.2.

EU-PLANER

This emission unit consists of lumber saws and planing operations that are controlled by a bag filter collector. The duct work observed showed that emissions from the saws are routed outside to the baghouse and then back into the facility to be discharged (SC VIII.1). A pressure drop monitor was observed on the baghouse (SC VI.1). Mr. Holcomb provided an inspection log used to record the pressure drop from the baghouse once per day when operating (SC VI.2). Records indicate that the pressure drop stays consistent around 0.1 inches of water.

EU-BOILER2

This emission unit is an ISO rated 23.89 MMBtu/hr wood-fired boiler. The boiler is used to provide steam to the kilns for lumber drying. Fuel consumption is monitored on a meter and is based on the number of fuel auger revolutions times the pounds of wood consumed per revolution (SC VI.2). Mr. Clarke provided records of the monthly and 12 month rolling time period fuel consumption for EU-BOILER2. For May 2018 – April 2019, the rolling 12-month fuel consumption was 1,019.70 tons (SC II.2 and SC VI.3).

FGKILNS

Seven of the ten permitted indirect-steam heated kilns are in operation, while the other three are planning on being installed. Monthly and 12-month rolling records were provided of the wood species dried, along with the VOC content per MBF and VOC emissions from drying (SC VI.2). For the periods of May 2018 – April 2019, a total of 4,999,477 BF was dried and 10.59 ton of VOC emitted (SC I.1 and SC II.3). The VOC content of the wood species dried ranges from 2.0 – 4.3 lbs C/MBF (SC II.1 and 2).

FGCOAT

This emission unit includes two coating areas to spray paint on lumber for identification purposes. Records are maintained by noting the date and number of tanks installed. Each tank of paint is 55 gallons. Records provided showed use from 6/20/2017 – 08/12/2018 for a combine total of 770 gallons of coating (SC II.1 and SC VI.3). Mr. Clarke stated that no other tanks have been installed and used since 08/12/18 with the facility undergoing a change in ownership. The Material Safety Data Sheet was provided for the coating being used. No volatile organic compounds (VOC) are identified in the material (SC II.2 and SC VI.2).

Compliance

Based on this inspection, Banks Hardwoods is in compliance with PTI No. 92-06A.

NAME *Michael Miller* DATE *5/16/2019* SUPERVISOR *EDJ*