

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

P021536402

FACILITY: ISABELLA PELLET		SRN / ID: P0215
LOCATION: 6900 W BASELINE RD, LAKE ISABELLA		DISTRICT: Saginaw Bay
CITY: LAKE ISABELLA		COUNTY: ISABELLA
CONTACT: Gary Glawe		ACTIVITY DATE: 08/23/2016
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Records review		
RESOLVED COMPLAINTS:		

On August 19, 2016 Ben Witkopp of the Michigan Department of Environmental Quality - Air Quality Division (MDEQ-AQD) went to Isabella Pellet to conduct an inspection. It is covered by air use permit 30-11B. The facility uses waste softwood chips from northern Michigan sawmills as its raw material. The chips are then dried by a natural gas fired dryer and routed through a cyclone prior to additional processing. The process basically consists of using a hammer mill, pelletizer, cooler, and bagger to produced pellets. The end products could be fuel for home stoves or even animal bedding though specifications differ.

A vehicle was parked outside but the facility was not operating at the time. I entered the office area, found no one and then went through the manufacturing area. Again, no one was found. Time was subsequently spent checking around the outside of the facility. No one was found. Pictures were taken of the areas outside of the facility. The area under the cyclone had dust and chips on the roof but they appeared to be historical in nature due to their weathering and color. A repair of the ductwork was also evident. The conveyor running from the cyclone to the inside of the building was losing a significant amount of material creating piles and drifts of dust outside. The loss of material during conveyance is a violation of FGwoodpellets SC III 1.

Two men then showed up. They explained they were a couple of former employees looking for their last paychecks. I made sure they did not do any damage to the facility and stayed a while after they left. Roger, another employee, then showed up. Having recognized him, I told him about the former employees showing up and that no one else was around. I asked Roger who the general manager was. He said Skip Uber was gone and Rory Nevins was now in charge of day to day operations. He said Rory would be back the following week.

I returned on August 23, 2016 and Rory was there. I told him about my stop the previous week. I asked to see the records required by the air permit. Records of the moisture contents were being kept, however they were the contents found in the material as received. Spot checking revealed contents in the low 50% to mid 60% for several days in 2016. The permit has a maximum moisture content of 50% but that is specified for material being fed into the dryer, not as received. The raw material piles are stored outside so they are also subject to rain and snow. The higher the moisture the more it costs to dry, so they typically blend material to get a lower moisture content. I explained to Rory they should be checking it when it is fed into the dryer. The current practice of measurement, especially given the high moisture content, is a violation of EUdryer SC VI 3. However, the type and quantity of wood received is being tracked per load received, as required.

The section of the permit under EUdryer SC VI 4 requires the monitoring and recording of the tons of green softwood chips processed in the dryer. The limit is 8 tons per hour. The records were unavailable. Rory said he believed Gary Glawe, the owner, has, or calculates, that information but it was unavailable. This is another violation. It should be noted the 8 tons raw is roughly equivalent to 5 tons dry. Records of dry material showed less than 3 tons being produced so it does not seem the limit of 8 tons raw was being exceeded even in the absence of actual records.

In a similar manner, the facility is not recording the hourly fuel consumption of the dryer burner. This is a violation of EUdryer SC VI 7. The temperature at the dryer inlet is specified not to exceed 850 degrees F. Records were kept and the temperature was found to be in the 600-800 range. The operating system is set to automatically trip if the temperature is exceeded. The fan setting for the dryer was set at 10 which coincided with the stack testing conditions. It should be noted the stack testing was done on a used dryer that was wood fired and the current one is gas fired. Visible emissions are being checked

and recorded as required.

FGwoodpellets SC II 1 has a limit on the tonnage of chips processed per year on a 12 month rolling time period. SC III 2 states that a chip storage pile on site for more than three days per week and the storage pile can not be in place longer than three consecutive days. SC III 3 has a limit on the number of operating hours per year on a 12 month rolling time period. There are record keeping requirements to show compliance with the aforementioned limits. Unfortunately, the records did not exist and therefore result in violations of SC VI 2, 3, and 4 of FGwoodpellets.

The facility is subject to Administrative Consent Order 43-2014 so the violations noted above are subject to stipulated penalties. It should be noted the facility has three outstanding payments of the settlement amount contained in the order.

NAME B. W. Thayer

DATE 9-14-16

SUPERVISOR C. Hall