

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection**

P076762989

FACILITY: Pallet Solutions by the Dutch Legacy Company		SRN / ID: P0767
LOCATION: 9932 Northeast Kendaville Road, VESTABURG		DISTRICT: Grand Rapids
CITY: VESTABURG		COUNTY: MONTCALM
CONTACT: Amos Esh , Manager		ACTIVITY DATE: 05/04/2022
STAFF: Scott Evans	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On site inspection to assess compliance with applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

Introduction

On Wednesday, April 13, 2022, State of Michigan Department of Environment, Great Lakes, and Energy Air Quality Division (AQD) Staff member Scott Evans (SE) conducted an unannounced, on-site inspection of the Pallet Solutions facility located at 9932 Northeast Kendaville Rd. in Vestaburg, Michigan, in order to assess compliance with the requirements of Permit to Install (PTI) No. 187-16 and all other air quality rules and regulations.

Pallet Solutions is a woodworking facility that manufactures wooden pallets for commercial use. Lumber is received by the facility, sorted, cut, steam treated for pests, and assembled on site.

Upon arrival at the facility, SE conducted an initial inspection of the facility perimeter. No odors or visible emissions were observed at the exterior of the facility at this time. After entering the facility, SE was greeted by Manager Amos Esh. A brief discussion was held to discuss the purpose of the day's visit. After this discussion, a walking inspection was conducted in which the manufacturing floor and the cyclone were visited.

PTI No. 187-16

This permit was initially applied for on October 26, 2016 and approved on November 29, 2016. It includes requirements for one emission unit (EU): EUPALLETPROD. This unit includes the pallet manufacturing plant with a particulate control cyclone. There are no other emission units or flexible groups in this permit.

The EU has one required emission limit, which is that visible emissions shall not exceed a six-minute average of 15% opacity at any time. During the inspection there were no instances of visible emissions observed. It was expressed by facility staff that no incidents of excess VEs had occurred since the last inspection.

The EU has four required operational restrictions:

- Hours of operation of any part of the unit controlled by the cyclone shall not exceed 3,120 hours of operation in any 12-month rolling annual period.
- The unit cannot operate unless an appropriate Malfunction Abatement Plan (MAP) is implemented.
- All sawdust must be managed to minimize generation of fugitive emissions.
- The unit cannot operate unless a fugitive dust plan is implemented and maintained.

During the inspection these restrictions were assessed:

- Discussion of hours of operation is covered in the recordkeeping section of this report.

- The MAP implemented on site is the same that was provided to the AQD on March 28, 2017. It appears that the facility is following this plan properly.
- Sawdust appeared to be appropriately controlled to minimize fugitive emissions.
- The Fugitive Dust plan implemented is the same that was provided to the AQD on March 28, 2017. It appears that the facility is following the plan appropriately.

The EU has one required design parameter: any part of the manufacturing process that requires the dust control cyclone cannot operate unless the cyclone is properly installed and operational. During the inspection it could be seen that the cyclone was operational as demonstrated by the flow of wood shavings and sawdust entering the collection housing from the cyclone, which is located on the roof of the facility. No fugitive sawdust was seen coming from any other part of the equipment.

The facility is required to maintain records of monthly and 12-month rolling annual hours of operation of the cyclone. Records were discussed during the inspection to confirm proper adherence to permitted requirements. It was explained that the facility doesn't operate unless the cyclone is running and so cyclone operation matches facility operational hours at a recorded 45 hours per week. At 45 hours per week and assuming 52 weeks of operation per year, the facility operates annually for 2340 hrs. This demonstrates compliance with the limit of 3,120 hours of operation. The facility was advised that an explicit record of the hours of cyclone operation should be kept to comply with the condition within the PTI.

The facility has one stack that services the cyclone. This stack was not measured directly for safety concerns, but the stack appears to meet the height requirement of 35ft above ground height.

Exemptions

During the inspection, multiple pieces of woodworking and machining equipment were observed. All equipment vented to the interior of the facility and appeared exempt from permitting requirements under Rule 285(2)(l). There was also a welding station observed. This station appeared to be exempt from air permitting requirements under Rule 285(2)(i).

Conclusion

At the conclusion of the inspection the facility appeared to be compliant with the requirements of PTI No. 187-16 as well as all other applicable air quality regulations.

NAME Scott Evans

DATE 5/25/2022

SUPERVISOR HH