

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

P123364236

FACILITY: Biewer of Lansing, LLC		SRN / ID: P1233
LOCATION: 6111 Mount Hope Highway, LANSING		DISTRICT: Lansing
CITY: LANSING		COUNTY: EATON
CONTACT: Paul Kratochvil , General Manager		ACTIVITY DATE: 08/29/2022
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: First time facility has been inspection by AQD under permit. Off-site inspection conducted to determine compliance with PTI 107-21A.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Paul Kratochvil, General Manager (pkratochvil@biewerlumber.com)

Lisa Reed, Consultant, ACES Consulting Group (lreed@acesconsult.com)

Purpose

Conduct an announced offsite/virtual compliance inspection of Biewer Lumber to determine compliance with PTI No. 107-21A for 2 Wellons double-track natural gas-fired batch kilns and associated lumber pressure treatment equipment.

Facility Background/Regulatory Discussion

Paul Kratochvil said that Biewer is a lumber treatment facility. Untreated lumber arrives via flatbed truck and railcar. The lumber is pressure-treated in one of two treatment vessels which contain fire retardant and micronized copper azole chemicals. These chemicals help preserve the wood for outdoor applications. The wood is allowed to drip-dry prior to being dried in the kilns to remove excess moisture and to heat-set the chemical treatment. The 2 kilns are natural gas-fired. This facility was built in 1991.

Biewer operates 3 shifts and the kilns can operate anywhere from 20 – 30 hours per week

This is the first time this facility has been inspected since the issuance of its first permit, PTI No. 107-21, in December 2021. PTI 107-21 was issued for the installation of a new kiln (construction completed in May 2022). PTI 107-21A was issued in June 2022 to permit the older kiln (installed in 1999).

Inspection:

This was a virtual, offsite inspection. A Microsoft Teams meeting was scheduled at 1:00 p.m. on August 29, 2022 to conduct the virtual inspection. P. Kratochvil was onsite for the inspection and used his phone to virtually provide a tour of the facility. Lisa Reed was also present virtually. Table 1 contains a list of equipment currently onsite, as verified during the virtual inspection.

Table 1. Permitted and exempt equipment located onsite.

Emissions Unit	Description	PTI/Exemption	Compliance Comments
2 Natural Gas-Fired Wellons batch kilns	Equipment used to dry treated lumber and plywood.	107-21A	See discussion below.
2 Natural Gas-Fired boilers.	Used to heat up lumber treatment chemicals	NA	Boilers were last used in 2019. Both have been rendered permanently inoperable by disconnecting the natural gas lines from each boiler. Biewer plans to scrap both units. Biewer uses different chemicals now, and so there is no longer a need to heat up the chemicals prior to use.
Parts Washer	<10 ft2 surface area	Rule 281(2)(h)	Appears to meet the requirements of Exemption Rule 281(2)(h) Lid is closed, operating instructions were on the inside of the lid.
2 Natural Gas-Fired Emergency Generators	<10 MMBtu/hr max rated capacity	Rule 285(2)(g)	Both generators are inoperable. Biewer plans to scrap these out. Generator behind office hasn't run since 202 (and valve for the gas is disconnected) and the other generator hasn't run in 10 years. Plan is to remove both units the week of August 29, 2022

PTI 107-21A: EULUMBERTREATMENT

PTI 107-21A permits equipment used for pressure etreating lumber and plywood including two Wellons double-track natural gas-fired batch kilns.

Only kiln 2 was processing lumber (douglas fir and southern yellow pine) during the inspection.

This PTI only contains Emission Limits, Material Limits, Monitoring/Recordkeeping requirements, and Stack/Vent restrictions.

Emission Limits& Monitoring/Recordkeeping

Biewer is limited to 32.1 tons of VOC per 12-month rolling time period, as determined at the end of each calendar month. VOC's are based on EPA Region 10 (Douglas Fir) and Georgia Environmental Protection Division (Southern Yellow Pine & Spruce Fir Pine) Emission Factors, see attached. For future inspections it would be worthwhile to learn how the company generates their Southern Yellow Pine & Spruce Fir Pine emission factors). Biewer tracks the type of hardwood or softwood species, and the amount of each in MBF (1,000 board feet), and the VOC emissions are calculated on a monthly and 12-month rolling basis.

L. Reed provided this data for the period of January – July 2022, as requested by AQD. Total VOC for this period was 3.41 tons per year.

Material Limits

Biewer is permitted to dry no more than 32,400 MBF per 12-month rolling period. Monthly and 12-month rolling records were provided for the throughput on each kiln separately and combined. Total lumber dried from January – July 2022 between both kilns was 4,932 MBF, within the limit of the permit.

Stack/Vent Restrictions

The exhaust gases from the 2 kilns emit from SV-KILN1 and SV-KILN2. Future inspections may involve the use of the AQD's Nikon Forestry Pro II rangefinder to ensure the heights of these vents are meeting the height restrictions contained within the permit (21 feet each).

Compliance Statement: Biewer Lumber appears to be in compliance with PTI 107-21A at this time.

NAME Michelle Luplow DATE 9/26/22 SUPERVISOR RB