

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

ACTIVITY REPORT: Self Initiated Inspection

U5909018435948

FACILITY: Pallet Solutions		SRN / ID: U59090184
LOCATION: 9932 Kendaville Rd		DISTRICT: Grand Rapids
CITY: Vestaburg		COUNTY: MONTCALM
CONTACT: David Troyer, Manager		ACTIVITY DATE: 08/11/2016
STAFF: Steve Lachance	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: <i>MINOR</i>
SUBJECT: Self-Initiated Inspection prompted by Complaint (SLachance, 8/12/16)		
RESOLVED COMPLAINTS:		

What started out as an open burning complaint response became a facility inspection.

Arriving in the facility vicinity late morning, Thursday August 11, 2016, AQD Staff SLachance (SL) and Chris Robinson (CR) surveyed the area for indications of open burning activities. SL observed some black staining on some plastic-wrapped silage behind the facility and thought perhaps this was the result of a compost fire/smoldering; but no other evidence of open burning was obvious from off-site.

The facility appeared to be busy; outdoor stacks of pallets, scrap wood for sale, a truck being loaded with another waiting; as well as an abundance of sawdust on the roof, on the top of the "cyclone bin", the bin itself overfull and on the immediate grounds.

AQD staff introduced themselves to Manager Mr. David Troyer. SL explained the receipt of the open burning complaint, but also announced his intention to complete an inspection relative to air quality rules and requirements. SL provided the DEQ "Environmental Inspections: Rights and Responsibilities" to Mr. Troyer, who was accommodating and helpful during the on-site activities. Mr. Troyer explained that the facility is under new ownership since January and he was unaware/not involved with previous complaint situations that have been documented by AQD.

With respect to the current open burning complaint; Mr. Troyer admitted to having provided a fire/cookout for employees the week before (in the same time frame as receipt of the complaint.) A small burn patch was noted near the western boundary of the property. There was no indication of the burning having been large, no ashes of concern and no fuel staged nearby; it seems to have been a small and isolated event. SL shared the AQD's Open Burning Regulations brochure and outlined legal (such as a recreational or food preparation fire not resulting in nuisance conditions) vs. illegal burning practices (using such burning to dispose of waste.) Mr. Troyer received the information and appeared to understand these distinctions.

SL requested to view the silage area. Mr. Troyer explained that this was not part of the pallet operations, but rather privately owned. He did provide access, though, and it became obvious that the silage was not scorched, but was rather spoiled with mold or mildew.

SL concludes that no illegal or nuisance burning appears to have taken place recently, and turned the inspection's attention to sawdust collection and control from the pallet manufacturing. Emissions from the various saws within the plant are exhausted by three fans to three cyclones. Mr. Troyer was not aware of the amount of air moved by each fan. Collection of dust-laden air was not perfect, because there was sawdust within the building; but housekeeping practices were evident as the work areas were tidy.

SL documented the sawdust collecting on the roof, on top of the cyclone bin, etc. While no visible stack emissions were evident from the cyclones, the system was visibly losing fugitive saw dust onto the roof, from the outdoor duct work, cyclone dust collection bin, etc. Moreover, the stockpile of sawdust outside the bin was a potential source of fugitive dust, too.

SL asked about disposal of the dust; it is used as a soil additive by local farmers. Some of the collection system's performance issues might have been attributable to the "overfull" condition of the collection bin.

SL explained that the sawdust collection and control system likely needed a Permit to Install to control emissions to the expected level. No particular exemption appeared to fit the equipment as installed. Outdoor emissions from such a process would require fabric filter controls to be exempt (such as per Rule 285(I)(c)), and while Rule 285(I)(B) would allow for exemption if the emissions were routed to the facility's indoor environment, it is not likely that this would be allowable per workplace comfort and safety. Rule 290 would also require a fabric filter

as well as maintenance of records.

SL concludes that the equipment has been installed in violation of Rule 201.

As observed, the existing cyclones were also not operating in accordance with the "satisfactory" requirements of Rule 910.

SL recommends issuance of a Violation Notice for Rule 201 and Rule 910.

NAME SD Jankar DATE 8/12/16 SUPERVISOR [Signature]