

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

A008533650

FACILITY: PANEL PROCESSING INC		SRN / ID: A0085
LOCATION: 120 N INDUSTRIAL HWY, ALPENA		DISTRICT: Gaylord
CITY: ALPENA		COUNTY: ALPENA
CONTACT: Chris Boyk , Environmental Engineer		ACTIVITY DATE: 02/23/2016
STAFF: Gloria Torello	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: 2016 FCE		
RESOLVED COMPLAINTS:		

SRN: A0085 Name: Panel Processing, Inc.

Directions: The facility is located in Alpena County. From US 23 in Alpena, turn west on West Hamilton Road, turn south on North Industrial Highway. The facility is on the curve.

Application: This is a wood panel coating facility. The application 243-09 combined two permits, 250-84A and 408-99, into one permit while maintaining the VOC/HAP limits set forth in permit 408-99.

Permit. On November 30, 2009 the AQD issued opt-permit 243-09. The permit includes EUFABRICATING, EUPAINTLINE1, EUPAINTLINE2.

On January 19, 2016 the AQD received an application from the permittee to increase the VOC material limit for coating from 0.315 lb/gal to 0.510 lb/gal. This application, 243-09A, is assigned to AQD's David Thompson and the application is under review.

Malfunction Abatement Plan (MAP): The permit does not require a MAP.

MAERS: The 2014 MAERS reported 6.7 tons of source wide VOC emissions. This is less than the permitted 18 tpy VOC from FGPAINTLINES.

MACTS: The facility has taken permit limits to be a synthetic minor for HAPs.

MACES:

- Facility Information was updated to include a description.
- Regulatory Info was reviewed and the following change was made:
 - Subject To was updated to include 40 CFR, Part 63, Subpart QQQQ .

Brochure: The inspection brochure will be forwarded to the permittee via email with the site inspection notes.

Compliance: A review of AQD files and MACES report generator show no outstanding violation.

Inspection: To complete the FCE, Torello met at the facility and communicated via telephone and email with Mr. Chris Boyk and Mr. Lowell Kollien of Panel Process. During the February 23, 2016 site visit, both Chris and Lowell met with AQD's Gloria Torello for this unannounced site visit. First there was discussion in the office, then there was a tour of the facility.

Recently the facility submitted to AQD application 243-09A. With the application, Torello and Mr. Boyk discussed clarifying existing permit conditions, see A. and B. below. Torello has shared the discussion with AQD's David Thompson for his information.

FGPAINTLINES.

A. V.1.

The permittee shall determine the VOC content, water content and density of any coating or solvent, as applied and as received, using federal Reference Test Method 24. Or as an alternative, and upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content

from manufacturer's formulation data, or the Safety Data Sheets. If the Method 24 is performed, and if the Method 24 and the formulation values should differ, then the permittee shall use the Method 24 results to determine compliance. (R 336.1225, R 336.1702, R 336.1901, other?)

- B. VI.3.b. "with water" is this needed? "pound per pound" is this needed?
VI.3. b&c. Are these redundant?

The discussion included records review.

Tour of Facility.

EUFABRICATING

During the tour, EUFABRICATING operated. The permit describes EUFABRICATING as "board fabricating equipment used for cutting and perforating of boards prior to coating operations controlled by a baghouse dust collector that vents into the facility." Torello observe some of this fabricating in action. There is a dust collection system that collects saw dust. Saw dust was not noted in or outside the building.

Torello observed the grinder used to grind scrap left over from the EUFABRICATING process. The ground material is placed in a semi-truck trailer which is parked in an enclosed building. Through a permit from State of Michigan, the material is delivered to farms where the material is used to absorb cow manure and then land applied.

Torello observed SVFABRICTING stack. Via visual assessment, the stack meets the 54 x 54 maximum diameter dimensions and the minimum of height above ground of 29.5 feet. The permit's description of Pollution Control Equipment includes, "Baghouse dust collector vents inside the facility." The stack may vent indoors or outdoors. No dust was noted.

FGPAINTLINES

During the tour, EUPAINTLINE1 operated, but EUPAINTLINE2 did not operated. Typically, EUPAINTLINE1 operates two shifts per day, five days per week. EUPAINTLINE2 has two exhaust stacks, but the permit includes only one stack vent, Torello shared this information with AQD's David Thompson for his information. There was a lid on the 55 gallon drum of acetone/isopropyl alcohol found near EUPAINTLINE1. Chris said there is one parts cleaner onsite and it uses non-volatile cleaner.

Review of permit conditions:

EUFABRICATING

I.1&2. PM limits. AQD has not requested compliance test under General Condition 13.

I.3. No visible saw dust was ~~not~~ noted in or outside of the building.

VIII.1. Via visual assessment, the stack limits are met.

FGPAINTLINES

I.1., VI.3.e. Records for 11/12/15 show the VOC emissions were 15.77 lb/day, the permit limit is 612 lb/day. To calculate the daily VOC emissions, the permittee sums the pounds of paint used per day and multiplies the sum by 3% or %VOC found on the Safety Data Sheet, whichever is higher.

I.2., VI.4. In December 2015 the 12-month rolling VOC emissions were 2.9 tons, the permit limit is 18 tpy. In January 2016 the 12-month rolling VOC emissions were 2.9 tons, the permit limit is 18 tpy. The Rolling 12-Month Coating Utilization records for years 2015 and 2016 include monthly and 12-month rolling VOC emissions. The record does not include a unit of measurement, however the measurement is in pounds and needs to be converted to tons. Torello asked Lowell to update the record and include the unit of measurement.

II.1. & 2, V.1. The permittee uses the manufacturer's formulation data found on the Safety Data Sheets to demonstrate compliance with the VOC (Filler) and VOC (Coating) limits. The Rolling 12-Month Coating Utilization record includes fillers, but not coatings. Lowell said the facility stopped using coatings and rarely uses fillers. Torello will ask Lowell to update the form to include unit of measurement, and include *coatings*.

III.1. Waste solvents and coatings are stored in closed containers. Chris said there may be no more than one 55 gallon drum generated in the year.

VI. 1. FGPAINTLINES calculations were completed in the permitted timeframe.

VI. 2. The permittee uses Safety Data Sheets as the means to maintain a current listing from the manufacturer of the chemical composition of each filler, coating, and solvent.

VI.3.a., b., c., d. Safety Data Sheets are used to demonstrate compliance.

VI.3.f. The daily record includes hours of operation.

VI.4. The Rolling 12-Month Coating Utilization record includes VOC monthly and 12-month rolling emissions.

VIII.1., 2. Torello observed the paint lines, based on a visual assessment the stacks appeared to meet the permit limits.

FGFACILITY

I.1., 2., VI. The permittee does not keep records of the HAPs emissions. Both Chris and Lowell explained the materials used have no or trace HAPs. Torello communicated with Lowell the facility needs to keep records of HAPs emissions as outlined in the permit.

III. As a general statement, the permittee keeps containers covered.

V. The permittee determines the HAP content of any filler, coating, or solvent as received and as applied using manufacturer's formulation data. AQD has not requested testing.

Conclusions:

FGPAINTLINES

Regarding the Rolling 12 Month Coating Utilization record, Torello asked Lowell to update the record and include the unit of measurement; and Coating VOC under Product Tracked.

EUPAINTLINE2 has two exhaust stacks, but the permit includes only one stack vent. Torello shared this information with AQD's David Thompson for his information.

FGPAINTLINES

I.1., 2., VI. The permittee does not keep records of the HAPs emissions as required and outlined in VI. Monitoring/Recordkeeping. Torello asked Lowell to develop record keeping of HAPs emissions as outlined in the permit condition. Torello asked for this to be completed by May 10, 2016.

With the above exceptions, via onsite inspection, review of records, and discussion with permittee staff, the permittee demonstrates compliance with the conditions of permit 243-09.

NAME Gloria Torello

DATE 6-2-16

SUPERVISOR 

