



Phone 906-667-0277
Fax 906-667-0815

Bessemer Plywood Corp.

1000 Yale Avenue
Bessemer, MI 49911-1850



September 26, 2022

Mr. Joseph Scanlan
EGLE – AQD Marquette District Office
1504 West Washington
Marquette, MI 49855

Re: Bessemer Plywood Co. Response to Violation Notice Dated September 6, 2022

Dear Mr. Scanlan:

Bessemer Plywood Co. (Bessemer) has prepared this letter to address the issue outlined in the Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division Violation Notice dated September 6, 2022. The violation notice (VN) alleges that Bessemer violated General Condition 11.a of Permit to Install (PTI) No. 35-20B, which states:

Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). (R 336.1301)

a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.

EGLE performed Method 9 visible emissions (VE) readings on EUWOODBOILER1 and observed one 6-minute average above 27 percent opacity (30 percent) and a second highest 6-minute average VE observation of 21 percent, both above the R 336.1301(1)(a) 20 percent average opacity limit. As noted in the EGLE VE form attached to the VN, EGLE took readings for approximately 30 minutes. It is worth noting that the readings documented in EGLE VE observations began to dissipate in less than half an hour from the start of the readings, indicating that the cause is not attributable to a continuing system malfunction but rather a short-term change in boiler operating conditions.

Bessemer is providing this response to the VN as requested.

Date of Violation Occurred: August 16, 2022

Explanation of the Causes: Standard boiler operation is to mix sander dust with other wood, such as hogged wood, to minimize potential fluctuations in excess air. During the period when higher than normal visible emissions observations occurred, the operator fed only sander dust to the boiler. This led to a momentary starvation of excess air and the resulting opacity readings. Bessemer believes that this was the cause of the single opacity reading above the applicable R 336.1301 threshold.

Duration of Violation: As noted in EGLE VE readings, the opacity readings greater than 20 percent (removing the one reading above 27 percent) were eight 6-minute readings, which tailed off after about 15 minutes.

Whether the Violation is Ongoing: As noted above, the opacity dissipated within 15 minutes; therefore, the violation was not ongoing.

Summary of Actions Taken, Proposed to be Taken, and Associated Dates: When the high opacity was brought to the attention of Bessemer personnel, an investigation of the potential cause of the high opacity was quickly initiated. It was determined that the operators (one of whom was a trainee) over fed the boiler with sander dust, which is not standard operation. Standard operation is to mix the sander dust with other types of wood fuel (such as hogged wood). This standard operation prevents from starving the excess air from the combustion of the fuel, which could result in higher opacity. Actions taken were bringing this to the attention of the boiler operators and providing further instruction on proper boiler operation.

The actions proposed is to provide additional training to the boiler operators on proper feed to the boilers and emission opacity reading. In addition, the Wood-Fired Boilers Malfunction Abatement Plan (MAP) has been updated to include action to adjust fuel feed and excess air when excessive opacity is visible. See Section 5.0 Corrective Actions. Attached is the updated MAP.

The actions have already been completed; therefore, associated dates are not applicable.

We trust that the above responses have adequately addressed the opacity issue and the requests listed in the VN. If you have questions or comments, feel free to contact me or Teresa Kinder at Barr Engineering Co. (tkinder@barr.com, 616.560.7519).

Respectfully,

Bessemer Plywood Corp.



William Thomason
Vice President

Enclosed: Wood-Fired Boiler Malfunction Abatement Plan dated September 2022