

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Records Review (In office)

N511154181

FACILITY: SUPERIOR CEDAR PRODUCTS		SRN / ID: N5111
LOCATION: 101 FENCE FACTORY RD, CARNEY		DISTRICT: Upper Peninsula
CITY: CARNEY		COUNTY: MENOMINEE
CONTACT: DWAIN MELLEEN , GENERAL MANAGER		ACTIVITY DATE: 07/07/2020
STAFF: Michael Conklin	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: PCE for newly issued PTI No. 134-19.		
RESOLVED COMPLAINTS:		

Facility: Superior Cedar Products (SRN: N5111)
Location: 101 Fence Factory Rd, Carney, MI
Contact: Dwaine Mellen, General Manager, 906-639-2104

Regulatory Authority

Under the Authority of Section 5526 of Part 55 of NREPA, The Department of Environment, Great Lakes, and Energy may upon the presentation of their card, and stating the authority and purpose of the investigation, enter and inspect any property at reasonable times for the purpose of investigating either an actual or suspected source of air pollution or ascertaining compliance or noncompliance with NREPA, Rules promulgated thereunder, and the federal Clean Air Act.

Facility Description

Superior Cedar Products is a wood product manufacturer that produces lawn and garden products. The company processes cedar logs to produce chips, mulch, and fence posts. The facility consists of two buildings that contain machines for debarking, sawing, ripping, planing, and surfacing. Each of the two buildings contains a pneumatic transfer system that collects and routes wood waste from processing operations through a fabric filter collector (baghouse) to semi-trailers, where it is sold as product to paper mills or for animal bedding. The facility also contains a water-based, low VOC coating line as part of the fence posts production.

Emissions

Wood product manufacturing involves the generation of sawdust, planer shavings, or sander dust which contribute to levels of atmospheric PM and PM10. Cyclones or baghouses act as capture/collection systems for air pollution control and product recovery systems by separating wood residue from the airstream of pneumatic handling systems.

Volatile organic compounds (VOCs) are emitted during coating operations with solvent-based and water-based coatings. A coating can consist of resins, pigments, solvents, diluents, reducers, and thinners. Resins and pigments usually make up the solid (non-evaporative or non-volatile) portion of the coating. The volatile portion of the coating can consist of water, solvents, diluents, reducers, and thinners. These compounds evaporate during the application and curing of the coating. All unrecovered solvent can be considered potential emissions of VOCs.

Emissions Reporting

The facility is neither a major source for regulated air pollutants nor subject to any federal New Source Performance Standards (NSPS), and thus is not required to report its annual emissions to Michigan Air Emissions Reporting System.

Compliance History

The facility received a letter of violation in July of 2019 for not maintaining records to show compliance with the Rule 290 permit exemption for the coating operations. The violation was resolved in September of 2019 with issuance of PTI No. 134-19.

Regulatory Analysis

Superior Cedar Products is currently subject to PTI No. 134-19 for coating operations. The facility is considered an area source for hazardous air pollutants (HAP) because the potential to emit of any single HAP is less than 10 tpy and aggregate HAP emissions are less than 25 tpy. The facility is also considered a true minor source for all regulated air pollutants because the facility's potential-to-emit is less than 100 tpy for each regulated air pollutant. The facility does not contain any equipment or

processes that are subject to federal New Source Performance Standards (NSPS) or National Emissions Standards for Hazardous Air Pollutants (NESHAP).

Inspection

A records request was sent via email on 06/30/2020 to determine compliance with the newly issued PTI No. 134-19. The records requested were received via email on 07/07/2020.

EUPAINT

As part of the fence posts production, the posts are dipped in a white paint and hung on a rack to dry. The drying rack is a carousel that goes through several fans blowing room temperature air. The facility only uses one coating, that is a water based, low-VOC coating that is contained in an open dip tank. The coating is from Sherwin-Williams company, product number B2W902. The only other compound added to the dip tank with the coating is water. Any VOC emissions from the dip tank and the drying rack are emitted to the general in-plant environment.

The material safety data sheet (MSDS) and environmental data sheet (EDS) were supplied for the B2W902 coating (SC VI.2). This coating has a total VOC content of 0.06 lb/gal and a VOC minus water and exempt compounds content of 0.26 lb/gal (SC II.1, VI.3b).

Monthly coating usage records were supplied for the period of 01/01/2019 through 06/01/2020 (SC VI.3a). A 12-month rolling sum is also being recorded at the end of each calendar month (SC VI.3c). Throughout this period, the highest 12-month rolling total was 10,038 gallons of coating usage. This is below the 15,000 gallons of coating per 12-month rolling time period limit contained in SC II.2.

Records that were reviewed to determine compliance can be found here: <\\Gwn084m1oapf502\deg\GWN\SHARED\Air Quality Division\CONKLIN\Inspections\N5111\Records Request 2020>.

Compliance

Based on the records reviewed, Super Cedar Products is in compliance with PTI No. 134-19.

NAME Michael Min DATE 7/29/20 SUPERVISOR EL