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

FACILITY: FONTANA FOREST PRODUCTS		SRN / ID: N7657
LOCATION: 7175 CLAYTON AVE, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Wayne Jones , Plant Manager		ACTIVITY DATE: 04/12/2017
STAFF: Todd Zynda	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: April 12, 2017 Insp	ection	
<b>RESOLVED COMPLAINTS:</b>		

PURPOSE OF INSPECTION: Scheduled INSPECTED BY: Todd Zynda (AQD) PERSONNEL PRESENT: Wayne Jones, Plant Manager FACILITY PHONE NUMBER: (313) 715-9640 FACILITY WEBSITE: http://fontanaforestproducts.net/index.html

# FACILITY BACKGROUND

Fontana Forest Products (FFP), located at 7175 Clayton, Detroit, Michigan, manufactures wood pallets, boxes and crates.

The facility operates from 7:00 AM to 3:30 PM, Monday through Friday. The facility operates small natural gas heaters, and various woodworking activities (sawing, nailguns, etc) for the construction of pallets, boxes and crates.

# COMPLAINT/COMPLIANCE HISTORY

There have not been any complaints for this facility since April 28, 2009. The most recent inspection occurred on September 10, 2015. At that time the company was determined to be in compliance with air quality rules and regulations.

## OUTSTANDING CONSENT ORDERS

None

## **OUTSTANDING LOVs**

None

## **INSPECTION NARRATIVE**

On April 12, 2017, Michigan Department of Environmental Quality (MDEQ) Air Quality Division (AQD) inspector Mr. Todd Zynda conducted an unannounced inspection of FFP. During the inspection, Mr. Wayne Jones, Plant Manager, provided information and tour of facility operations relating to air quality.

During the opening meeting Wayne County Installation Permits were discussed. Based on the inspection of the facility, the majority of the below Wayne County Installation Permits will be voided as the equipment has either been removed or permanently shut down and not operable.

Permit #	Description	Notes
C-2113 and 2114	New Two Burners and Damper (incinerator?)	Permanently shut down and not operable
C-4994	Boiler - New Burner	Permanently shut down and not operable
C-9725	Boiler - 0019 Hand Fired Fuels	Permanently shut down and not operable

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C-9726	Incinerator- Single Chamber, After Burner Control	Permanently shut down and not operable
C-9727	Sawdust Storage Silo-0560	Removed
C-9728	Sawdust Storage Container and Single Cyclone	Cyclone and storage container were replaced in 2009. Former storage container and cyclone were removed.

Following discussion of the Wayne County Installation Permit a walk through inspection was conducted. The facility is primarily a large warehouse where wood is sawed and assembled into wood pallets, boxes and crates. Sawing stations are equipped with hoods that are vented to a cyclone located on the south side of the building. According to correspondence previously provided to the AQD, the cyclone was installed sometime during 2009. The pallets, boxes, and crates are assembled using nail guns. Raw lumber is stored outside on the south side of the building.

During the inspection the former facility boiler and incinerator were observed. The boiler is located in an adjacent building on the south side of the main manufacturing building. The boiler appeared to be nonoperational, and would likely require replacement (rusted out). The boiler building appeared to have a leak in the roof as the floor of the building was saturated. The incinerator is also located on the south side of the main manufacturing building. The incinerator doors are blocked off with stored wood. According to Mr. Jones, the incinerator has not been used in 15 years or more, and is not operational (the incinerator doors will not open). According to Mr. Jones, sawdust collected used to be burned in the incinerator for disposal. Saw dust now is collected using the cyclone and disposed of offsite. It was agreed that incinerator and boiler permits would be voided.

Following observation of the boiler and incinerator, an example of the small natural gas heaters at the facility was observed. While the heat input capacity is unknown, it appears that the gas heaters are likely each less than 1 MMBTU heat input.

The former saw dust storage sile-0560 (C-9727) has been removed from the site as verified during the inspection.

# PERMIT TO INSTALL EXEMPT EQUIPMENT/PERMITTED EQUIPMENT

### Natural Gas Heaters

The small natural gas heating units, are exempt from PTI requirements under the following Rule.

R336.1282(2)(b)(i): "Permit to install does not apply to.. Sweet natural gas, liquefied petroleum gas, or a combination thereof and the equipment has a rated heat input capacity of not more than 50,000,000 Btu per hour."

### Wood Working Equipment

Emissions from sawing and other wood working equipment is vented to a cyclone as described above. Wayne County Installation Permit C-9728 applies to a saw dust storage container and cyclone. As noted during the inspection and supporting documentation provided by the facility (see attached), the installation of the new cyclone and saw dust storage container appear to meet the PTI exemption requirement below.

R336.1285(2)(d): "Permit to install does not apply to...reconstruction or replacement of air pollution control equipment with equivalent or more efficient equipment."

Wayne County Installation Permit C-9728 will not be voided as the facility continues to operate a cyclone and sawdust storage bin for control of sawdust emission from the facility. Special Conditions for operation of the cyclone and storage container under Wayne County Installation Permit C-9728 could not be identified. At this time, only a permit certificate exists.

# MAERS REPORT REVIEW:

The facility is not required to submit Michigan Air Emission Reporting System (MAERS).

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### FINAL COMPLIANCE DETERMINATION:

At this time, this facility appears to be in compliance with federal and state air quality regulations. Wayne County Installation Permit C-9728 will remain active as the control equipment has been replaced meeting the requirements of R336,1285(2)(d). The remaining Wayne County Installation Permits (C-2113, 2114, 4994, 9725, 9726, and 9727) will be voided.

NAME

AK SUPERVISOR\_