

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

P021527772

FACILITY: ISABELLA PELLET		SRN / ID: P0215
LOCATION: 6900 W BASELINE RD, LAKE ISABELLA		DISTRICT: Saginaw Bay
CITY: LAKE ISABELLA		COUNTY: ISABELLA
CONTACT: Skip Uber , General Manager		ACTIVITY DATE: 10/03/2014
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection - pti 30-11A Consent order 43-2014 in effect		
RESOLVED COMPLAINTS:		

Ben Witkopp of the Michigan Department of Environmental Quality - Air Quality Division (MDEQ-AQD) stopped at Isabella Pellet to check compliance with air use permit 30-11A. It should be noted the facility is also subject to the conditions of consent order 43-2-14. The order was effective as of September 16, 2014. It was deemed better to check the facility earlier, rather than later, in case violations were found because the consent order contains a provision for potential stipulated penalties.

Brock Gutierrez was not around. Gary Glawe was present and introduced me to Mr. Skip Uber. Gary was a new partner in the operation in 2013. He brought Skip in to be the general manager of the facility. Skip had been with the firm for about two weeks.

Skip wanted to be brought up to speed so I discussed the history of the firm with him, at length, including the various permits and the stack testing. I also explained the origin of the consent order and its basic provisions.

We then went outside to check the north side of the facility where the burner, dryer and cyclone are located. There were several large piles of dirty chips / sawdust on the north side of the facility. I mentioned to Skip that back in June, Brock had promised those would be gone. I also told him it was my understanding the piles were not allowed by the Village in the original siting agreement. Skip said he was in contact with someone who would have them out quite soon. The piles were basically material that had fallen from the various conveyor transfer points. However, the previous management would have the material pushed around by a Bobcat and end up with material mixed with dirt. Skip recognized the value of the material being lost and had already placed hoppers to catch the material. He planned to have concrete pads placed under the transfer points and / or eliminate the use of conveyors entirely and go to another means of transporting material.

We then went inside to the control room. The temperature on the dryer inlet is not supposed to exceed 850 degrees Fahrenheit. Temperatures varied somewhat but were below the limit at the time. The current permit has a stipulation stating the temperature is to be monitored and recorded on a continuous basis. That is not being done. However, the system is set to automatically trip off if the temperature reaches that point. I told Skip that is something he might want to request be changed in any future permitting. In the interim, I told him to record the temperature every 15 minutes. Moisture of the incoming chips is not to exceed 45%. Each load of chips is tested and records indicated it was typically running about 40% with a high of 42% back in February. The fan setting for the dryer was still set at just above 10 which coincided with the setting during the stack testing in June.

We returned to Skips office to check previous records for visible emissions observations. Brock had been responsible for the observations and recording but the records were sporadic at best. This is a violation of permit conditions. I then informed Skip of the upcoming "smoke school" course and certification to be held in Gaylord Michigan near the end of the month. The facility was producing about 2.6 tons of product per hour. This is less than the 3.02 tons the facility stated was capable of being produced during the permitting process. During permitting that equated to 4.5 tons of green chip input.

Through the window in Skips office, it should be noted that small puffs of blue smoke could periodically be seen in the downdraft from the dryer stack. The amounts were quite small and lasted momentarily. I explained to Skip they should seek to prevent the blue smoke because in larger volumes it could lead to complaints. Additionally, it means the wood chips are potentially burning which could result in unacceptable product color.

The facility did not have a malfunction abatement plan (MAP) for EU dryer or EU material handling. Despite repeated attempts to get the plans submitted by previous management, none had been forthcoming. This is a violation of permit conditions. I explained the basic concepts of a MAP to Skip. He seemed to quickly grasp the concept and said he would be providing the MAPs.

I asked Skip if an audible alarm had been installed on the baghouse to sound during a low pressure situation. I explained the absence of such an alarm had been pointed out to Brock in June and that it was a requirement of the permit. He confirmed there was still no alarm but would promptly order one. This is another violation.

Raw wood chips are processed through the facility quite quickly. A permit condition stipulates storage be limited to no more than three days per week. The facility runs through about 80 tons per day so storage is shown to be less than two days. The facility also has a permit condition limiting it to processing not more than 33,600 tons of green softwood chips on a 12 month rolling time period. Records had been initiated in February so a 12 month rolling time period had not yet been completed. The monthly records were being kept.

Gary Glawe stopped in to see how things were going. I mentioned the violations and told him a violation notice letter would be forthcoming for the lack of MAPs, incomplete visible emissions records, and not having an audible alarm on the baghouse. Skip then asked a variety of questions concerning potential future permitting. His questions were answered and I also informed him to use it as an opportunity to request any changes to existing conditions if he feels the need to do so. I reminded both of them the consent order has provisions for potential stipulated penalties which would be determined at a later point in conjunction with the enforcement unit.

The facility is considered to be in non-compliance.

NAME

B. Valtkepp

DATE

11-12-14

SUPERVISOR

C. Alvo