

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

U4110022040464

FACILITY: Brink Wood Products		SRN / ID: U41100220
LOCATION: 1175 76th St SW, Byron Center		DISTRICT: Grand Rapids
CITY: Byron Center		COUNTY: KENT
CONTACT: Curt Brink ,		ACTIVITY DATE: 06/19/2017
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Compliance evaluation in response to fugitive dust/fallout complaint.		
RESOLVED COMPLAINTS: C-17-01312		

Background

Brink Wood Products (Brink) SRN: U41100220 is a wood recycling facility located at 1175 76th Street, Byron Center, Michigan. Brink is located in a residential area mixed with a light industrial area. The nearest residential structure is approximately 100 feet west of the facility. On June 19, 2017 the MDEQ had received the complaint (C-17-01312) related to Brink's operations. The complaint reported that there was fallout on vehicles and in the drains at their place of business. They were also concerned that there could be a fire that would burn down their business and potential cause harm. The complainant stated that this issue has been on going. The MDEQ AQD has previous records of complaints in 2010, 2011 and 2015. One of the 2010 inspections resulted in a violation notice. That afternoon I (Tyler Salamasick), Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division inspected the area surrounding Brink in response to complaint C-17-01312. I met with the complainant and spoke with them about the complaint. I also inspected one of the vehicles at the complainant's business. There was some dust on the vehicle, though it did not appear to be a significant amount (approximately 1mm on the windshield wiper). After speaking with the complainant and observing debris in the storm drain, I decided to wait to inspect Brink until I involve Ryan Grant with a multimedia inspection of Brink. Ryan is an Environmental Quality Specialist for the Michigan Department of Environmental Quality, Water Resource Division. Ryan and I inspected the facility and the area around the facility on June 26, 2017.

Inspection

We arrive near the site at approximately 9:30am on Monday morning. We inspected the storm drains on Ardith Ct SW near 74th St. We also inspected a retention pond north west from the corner of 73rd St. and Ardith Ct. The streets had a significant amount of wood chips and debris in and around them. There were also a significant amount of wood chips that had been tracked out near Brink's north east entrance. Ryan and I went to meet with the site contact at Brink. Upon meeting, we identified ourselves as MDEQ inspectors, informed the facility representative of the intent of our inspection and were permitted onto the site. Curt Brink showed us the facility and its operations.

Brink recycles trees and furniture waste materials. These processes are separate and are conducted in different areas of the facility. The trees/brush is chipped and turned into landscaping mulch. Brink uses water sprays and misters to control fugitive emissions while chipping the wood. This process appears to be exempt from Rule 201 pursuant exemption **R 336.1285(2)(gg)** which in part states:

336.1285 Permit to install exemptions; miscellaneous. ...

...(gg) Equipment used for chipping, flaking, or hogging wood or wood residues that are not demolition waste materials.

The wood chip piles did not appear to emit any significant amount of fugitive dust. I also did not observe significant opacity generated by the vehicle traffic. Brink's site is paved, but there are areas

with a significant amount of wood chips on the ground. The mulch appeared to retain moisture and seemed to act as a form of dust suppression. Brink may not need to remove this product from the onsite traffic areas, so long as it does not dry and generate dust or a nuisance.

After chipping, the mulch can then be dyed brown, red or black. Curt provided safety data sheets (SDSs) for the dyes which indicated the liquid primarily consist of iron oxide and/or carbon and water. The SDS also indicates that there is a polymer at 0% concentration. The polymer is likely indicated to be at 0% because its true concentration is insignificant. The dye area is in the center of the facility yard. The dye is added in liquid form to a large rotating drum that has wood chips fed into one side via a conveyor. Curt estimated that the facility uses between 100,000 lbs and 200,000 lbs of dye per year. This process is closed and does not appear to emit dye vapor as an air contaminant. Ryan and I did notice black staining that lead to the drain. Ryan informed Curt that they need to determine a method or practice to prevent the dye from running into the storm sewer.

Brink maintains the furniture chipping separately from the mulch processing area. The furniture that is chipped consisted of plywood and particle board. Curt informed me that this wood generally consists of waste wood or end cuts from furniture manufacturers in the area. The chipped material is sent to Genesee Power as an alternative fuel for energy production. Particle board is a composite material that can be made of various binding agents and wood. These binding agents can contain multiple hazardous air pollutants (HAPs) including formaldehyde. There is also some concern that the grinding of the particle board could release some formaldehyde, melamine and arsenic as well as other air contaminants. The product on site also had various external coatings, most of which appeared to be a laminate. I do not know if the laminate was made of plastic or some other material.

Curt estimated that the facility produces four loads of furniture chips at approximately 30 tons a piece each week. This roughly equates to 6240 tons of furniture chips produced per year. The chipping of laminated furniture does not appear to meet the exemption for **R 336.1285(2)(gg)**. The particle board and plywood is contaminated with laminate adhesives and various other materials and does not appear to meet the definition of wood. At the time of my inspection I even observed a load be rejected due to it containing too much foreign contamination. The contaminants were primarily plastic packaging and cardboard. This process is not permitted and does not meet an exemption. This is a violation of Rule 201.

I spoke with Julie Brunner, Senior Environmental Engineer for the Michigan Department of Environmental Quality, Air Quality Division. Julie is the assigned inspector for Genesee Power Station Limited Partnership (Genesee Power) SRN: N3570. I asked Julie if the facility is allowed to burn furniture waste that could consist of plastics, wood, adhesives and laminates. She initially indicated that they might be permitted to burn this material, but it would likely require additional material testing. Julie did not make a compliance determination at the time of our conversation.

In addition to speaking with Julie Brunner, I called and spoke with Duane Roskoskey, Environmental Engineering Specialist for the Michigan Department of Environmental Quality, Office of Waste Management and Radiological Protection. Duane explained some of the storage and handling rules as well as material make up to me. He also indicated that the facility was previously determined to be exempt from requiring permits with the waste division of the MDEQ.

Conclusion

I did not observe definitive evidence of fugitive dust or fallout at the complainant's location. The fallout I observed was not significant enough to constitute a violation of Rule 901. Brink's outdoor work area was damp and they were implementing dust suppression practices at the time of my inspection. The complainant's concerns will require action from local officials in regards to potential zoning or fire hazard issues. Ryan Grant from the MDEQ WRD is working with Brink to address potential storm water issues.

It appears that Brink Wood Products in violation of Rule 201 and will be required to apply for a

permit to install their furniture recycling process. If Brink believes that they can meet an exemption, they can attempt to demonstrate which exemption they meet as an alternative to applying for a PTI.

NAME  DATE 7/3/17 SUPERVISOR 

