

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

**ACTIVITY REPORT: Scheduled Inspection**

N139325550

FACILITY: BESSEMER PLYWOOD CORP		SRN / ID: N1393
LOCATION: 1000 YALE AVE, BESSEMER		DISTRICT: Upper Peninsula
CITY: BESSEMER		COUNTY: GOGEBIC
CONTACT: BERNARD SMITH, PLANT MANAGER		ACTIVITY DATE: 06/17/2014
STAFF: Ed Lancaster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled unannounced inspection.		
RESOLVED COMPLAINTS:		

Arrived at facility and met with the Plant Manager, Mr. Bernie Smith, for an unannounced inspection. Bessemer Plywood manufactures plywood which is classified as hardwood veneer. The company receives logs which are debarked and then rotary cut to produce the veneers. The remaining log blanks, approximately 4-inches in diameter, are sold to a company that mills them into landscape timbers.

We began the inspection by sitting in Mr. Smith's office to review the company's required recordkeeping. Mr. Smith informed me he no longer keeps records as the previous Air Quality Inspector told him the facility was a true minor source and he no longer needed to report. I informed Mr. Smith that information was incorrect as his PTI No. 202-04 has specific recordkeeping requirements and that he needs to begin keeping records again. Mr. Smith replied he has all of the raw data available for the missing records and he could create them. I told him that was not necessary, but to keep the raw data for the last five years in case he needs to produce the records.

The company has two wood-fired boilers (EUWOODBOILER1 is a 26.8 million Btu/hour boiler, EUWOODBOILER2 is a 21.9 million Btu/hour boiler) and one gas fired, 12.6 million Btu/hour boiler (EUGASBOILER).

Boiler #1 was not operating on the day of my inspection. The boiler log book showed it last operated on June 13th and consumed 15.996 tons of wood fuel for the day (SC Nos. 1.2, 1.3, 1.7 and 1.9). Mr. Smith informed me that they always record the maximum amount of fuel the boilers can consume on each day they are operated, instead of tracking the actual use. On April 28, 2005, the AQD received the company's Startup/Shutdown/Malfunction Plan (SC No. 1.4). Boiler #1 is equipped with two multiclones for PM control, captured emissions are emptied into a dumpster located below the multiclones (SC No. 1.5). The stack test for Boiler #'s 1 and 2 was conducted on August 30 and 31, 2005 (SC Nos. 1.6 and 2.5). The company was in compliance with their emission limits established in SC Nos. 1.1a and b, and 2.1a and b. As mentioned above the company was told they no longer needed to keep records, however they do record the number of hours the boilers operate and fuel use records in the boiler house log book (SC Nos. 1.8, 1.9, 2.8, and 2.9).

Boiler #2 special conditions are nearly identical to Bouiler #1, and the company is in compliance, except where noted above. The boiler was operating on the day of the inspection and the log book showed it had burned 40.32 tons of fuel on the 15th, and everyday it has operated. This boiler also has two multiclones for PM control, however, the captured emissions for this unit are collected in a 55-gallon drum, which is emptied once a day into the dumpster.

Both boilers are subject to the NESHAP Area source for boilers, subpart 6J. The initial notification was received on September 16, 2011, and the company is complying with the NESHAP using the annual Tune-up Work Practice Standard.

EUGASBOILER is used for emergency back-up. It is a 500 hp boiler fueled by natural gas only. It last operated on March 14, 2014, when the company conducted an annual tune-up on the unit.

The fabric filter for EUFUELSYSTEM appeared to be installed and operating properly (SC No. 4.2).

The company has not been asked to conduct any testing to verify VOC and formaldehyde emissions from EUDRYER3 (SC No. 5.1). Mr. Smith had a box of 24-hour temperature charts in his office from Dryer #3. A review of the charts revealed the dryer operates between 150 and 170 degrees Fahrenheit (SC Nos. 5.2, 5.3 and 5.4).

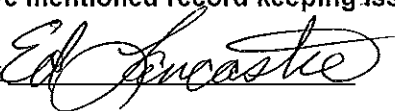
On the day of the inspection there were two sander baghouses in operation (EUSANDER SC No. 6.2)

There were no visible emissions observed from EUSTACKER's cyclone (SC Nos. 7.2 and 7.3).

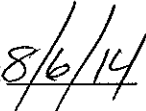
Mr. Smith provided me with a spreadsheet detailing the amount of resin used and the hours of operation for EUGLUESPREADER for the first five months of 2014 (SC Nos. 8.3 and 8.4). I did not observe any visible emissions from the glue spreading operations during the inspection.

At the time of my inspection the company seemed to be in compliance with their permit, except for the above mentioned record keeping issues.

NAME



DATE



SUPERVISOR

