DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N594072357

FACILITY: POTLATCHDELTIC LAND & LUMBER LLC.		**SRN / ID:** N5940
LOCATION: 650 A AVENUE, GWINN		**DISTRICT:** Marquette
CITY: GWINN		**COUNTY:** MARQUETTE
CONTACT: Amy Benson , Environmental Manager		**ACTIVITY DATE:** 06/18/2024
STAFF: Drew Yesmunt	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Targeted Inspection FY24.		
RESOLVED COMPLAINTS:		

Facility: PotlatchDeltic Land & Lumber, LLC (SRN: N5940)

Location: 650 A Ave, Gwinn, Marquette County, MI 49841

Contact(s): Amy Benson, Environmental Coordinator; Jim Pearson, Mill Manager

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

PotlatchDeltic's Gwinn Lumber facility is one of the company's six sawmills and has a lumber production capacity of 220 million board feet per year (MMBf/yr). The facility is located at 650 Avenue A, Gwinn, MI, a flat rural area in Marquette County that is in attainment for all criteria pollutants. Gwinn Lumber was originally constructed in 1998 following the issuance of Permit to Install (PTI) No. 299-96. This stationary, automated mill processes softwood species of Red Pine, Jack Pine, Spruce, Balsam, White Pine, and Tamarack into dimensional lumber. Wood chips, sawdust, and waste material that is generated onsite are sold to off-site sources or burned onsite in the facility's two wood-fired boilers.

Process Description

The mill process starts with green logs being debarked and sorted based on size. Logs entering the sawmill are considered "green" meaning they have a naturally higher moisture content than the final dry lumber product. The green logs are then laser scanned and rough cut into lumber by an automated saw. Rough cut lumber is stacked and enters one of four kilns for drying. After the lumber has reached the desired moisture content, the lumber is fed through a planer system that trims and edges the lumber into the final stud length. The lumber then passes through a machine

that grades the lumber based on quality indicators. After the lumber is graded, it is sorted, bundled, and shipped to customers.

Emissions

Wood product manufacturing involves the generation of sawdust, planer shavings, and/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 by separating wood residue from the airstream of pneumatic handling systems. Volatile organic compounds (VOCs) are emitted during the kiln drying of wood.

PotlatchDeltic contains natural gas-fired equipment, including a boiler and burner for dry kiln #4. Pollutants emitted from the combustion of natural gas-fired equipment includes nitrogen oxides (NOx), carbon monoxide (CO), volatile organic compounds (VOCs), particulate matter (PM), carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), and trace amounts of sulfur dioxide (SO2). Higher combustion temperatures and longer residence times result in higher NOx emissions. CO and VOC emissions are directly related to combustion efficiency. Higher combustion temperatures, longer residence times, and well mixing of fuel and combustion air results in greater combustion efficiency and lower emissions of CO and VOCs. Emissions of sulfur oxides are low since processed natural gas contains a very low sulfur content. PM emissions are also low since natural gas is a gaseous fuel. Nitrous oxide and methane emissions are related to the combustion temperature and amount of excess oxygen.

The source also contains wood-fired boilers. Waste wood material is collected and used as fuel in the boilers to produce process heat. The waste wood residue could include bark, sawdust, shavings, chips, or wood trim. The primary pollutants emitted from wood-fired boilers include PM, CO, NOx, and VOCs. The incomplete combustion of the organic material causes the release of these pollutants. Mechanical collectors, such as multicyclones, and flyash reinjection can reduce PM emissions. Furnace design and operating conditions (air/fuel ratio) contribute to combustion efficiency that in turn affects the quantity of pollutants emitted.

Emissions Reporting

PotlatchDeltic is required to report its annual emissions to MiEnviro Portal. The following table lists the source total emissions for the reporting year 2023.

Pollutant	Emissions (TPY)
CO	41.6

Lead	**<1**
NOx	**49.4**
PM10, FLTRBLE	**28.2**
PM10, PRIMARY	**28.8**
PM2.5, FLTRBLE	**26.1**
PM2.5, PRIMARY	**26.7**
SO2	**4.5**
VOC	**132.5**

Regulatory Analysis

PotlatchDeltic is subject to MI-ROP-N5940-2019a. The source is considered major for NOx, VOC, CO, and PM because the potential-to-emit (PTE) for these pollutants are over 100 tons per year (tpy). The facility is considered a synthetic minor source for hazardous air pollutants (HAPs) because the source took source-wide limits to restrict the PTE below the major source thresholds of 10 tpy for individual HAPs and 25 tpy for aggregate HAPs. The source is considered minor for all other criteria pollutants.

EU-WOODBOILER1, EU-WOODBOILER2, and EU-GASBOILER at the stationary source are subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units promulgated in 40 CFR Part 60, Subparts A and Dc. EU-GENERATOR at the stationary source is subject to the Standards of Performance for Compression Ignition Internal Combustion Engines promulgated in 40 CFR Part 60, Subparts A and IIII. EU-WOODBOILER1, EU-WOODBOILER2, and EU-GASBOILER at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources promulgated in 40 CFR Part 63, Subparts A and JJJJJJ. EU-FIREPUMP1, EU-FIREPUMP2, and EU-GENERATOR at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines Area Sources promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

Compliance History

The facility has received one violation notice in the last 5 years. The notice was issued on April 1, 2024, as a violation of Rule 331 for exceeding the PM emission limits laid out in MI-ROP-N5940-2019a and PTI No. 145-23. Following performance testing of FG-WOOBOILERS on January 16-17, 2024, the test results showed an exceedance in PM emissions from the exhaust of EU-WOODBOILER2. The cause of the exceedance was found to be a hole in the multicyclone of EU-WOODBOILER2. The violation was considered resolved on April 12, 2024, after the multicyclone was replaced and results provided from further performance testing demonstrated compliance with the PM emission limits.

Inspection

On June 18, 2024, AQD staff (Drew Yesmunt and Michael Conklin) conducted a targeted inspection of PotlatchDeltic Land & Lumber LLC in Gwinn, MI. AQD staff arrived at the facility and met with Amy Benson, Environmental Coordinator, and Jim Pearson, Mill Manager. It was explained that the purpose of the inspection was to ensure compliance with MI-ROP-N5940-2019a, PTI No. 145-23, and all other applicable air pollution control rules and federal regulations.

At the beginning of the inspection, a meeting was held to discuss the current and future operations of the facility and whether any changes or additions had occurred since the facility was last inspected. The facility explained that no changes to the facility or operations have been made since the previous inspection in December 2021 but that they are considering replacing EU-GASBOILER and EU-KILN4BURNER with biomass-fired units in the future. AQD staff explained that if the facility decides to move forward with this change, permitting would be required first before the facility can replace the emission units.

AQD staff also discussed the facility's response to the violation notice issued to the facility on April 1, 2024. It was noted by AQD staff that despite daily checks on the multicyclone, a hole in the multicyclone wall was not discovered until after preliminary results from performance testing were received and indicated excess emissions from the exhaust of EU-WOODBOILER2. It was then explained by the facility that to prevent the issue from recurring, the multicyclones for FG-WOODBOILERS will be on a four-year replacement schedule. AQD staff requested that the facility's malfunction abatement plan (MAP) be updated to reflect the change. A tour of the facility was then provided.

SOURCEWIDE

PotlatchDeltic is considered an opt-out source for HAPs since the facility took source-wide limits to restrict the PTE to less than 9 tpy for individual HAPs and 24 tpy for total HAPs. With having these source-wide emission limits, the facility is required to track the quantity of each HAP containing material used, the HAP emission factor of each HAP containing material, and individual and total HAP emission calculations for each calendar month and on a 12-month rolling time period basis.

The facility provided records that track monthly and 12-month rolling HAP emissions from all fuel burning emission units and dry kilns (SC VI.2). The dry kilns are the greatest sources of HAP and VOC emissions at the facility. The mill processes balsam, jack pine, red pine, and spruce wood species, and drying these species releases HAPs in the form of VOCs.

Emission factors for kiln drying are in lb/MBF and are from the PCWP MACT, NCASI NPRI reports, and kiln performance tests conducted at PotlatchDeltic mills. The wood-fired boiler HAP emission factors are in lb/hr and are from NCASI Technical Bulletin 858, Tables 20A and 20B with the exception of benzo(a)pyrene which uses emission factors from the most recent stack test. The potential-to-emit of all HAPs from each wood-fired boiler is 1.09 tpy and 2.18 tpy for both boilers combined. This is based on a maximum heat input capacity of 28.7 MMBtu/hr for each boiler operating 8760 hours per year. The potential-to-emit of all HAPs from kiln drying at the facility is 15.85 tpy, with the highest individual HAP being methanol at an emission rate of 13.62 tpy. This is based on a restricted red pine drying limit of 210,000,000 BF and total wood drying limit of 220,000,000 BF.

For the 12-month rolling period through May 2024, the records provided show all individual HAP emission rates to be less than 9 tpy based on a 12-month rolling basis. The methanol emission rate for a 12-month rolling time period basis stays consistent at about 6.9 tpy each month (SC I.1). Total aggregate HAP emissions for a 12-month rolling time period basis stay consistent around 17 tpy each month (SC I.2).

The source is required to maintain a facility-wide Malfunction Abatement Plan (MAP) that includes a preventative maintenance program for the air pollution control devices at the mill. The plan includes preventative maintenance schedules and procedures, inventory of critical spare parts, monitored operating variables, corrective action procedures, recordkeeping, and reporting (SC IX.1).

A fugitive dust plan is maintained at the facility for material storage piles, material handling equipment, plant roadways, and the plant yard. Many of these areas apply to EUPNEUMATICLINE where waste material is collected in a pile or container to be shipped off-site (SC lX.2).

EU-GASBOILER

The facility contains a natural gas-fired boiler for additional heating capacity to the wood-fired boilers. The boiler is a Cleaver Brooks with a rated heat input capacity of 48.8 MMBtu/hr and only burns natural gas (SC III.1). Monthly records of the amount of natural gas combusted were provided (SC VI.1). For January 2024 to May 2024, the boiler burned 41.01 MMCF. At the time of the inspection, the natural gas-fired boiler was operating. A natural gas line into the boiler was observed (SC III.1). No visible emissions from the stack were observed. No deviations were reported for EUGASBOILER during 2023.

EU-PNEUMATICLINE

This emission unit is a material handling system that collects waste green chips from saws and conveys them through one of three blow lines. Each line is dedicated to either the chip pile, rail car, or truck bin. The truck bin line is equipped with a cyclone that allows the separation of wood chips from the air stream so that they can fall naturally into the truck bed. This prevents fugitive emissions that would likely occur from the higher-pressure blow line releasing into an open top container.

SC III.2 requires truck bin loading to be restricted to less than 5,075 hours per year. With this limit, the facility is required to record the daily hours of operation. Records provided show the 12 -month rolling total for May 2024, to be 312.7 hours. The facility also maintains an hour meter to track truck bin loading hours. During the inspection, the hour meter was read at 2992.4 hours.

Non-certified visible emission checks on EU-PNEUMATICLINE are to occur daily (SC VI.2). PotlatchDeltic maintains records of visible emissions and leaks in the pipes of the pneumatic line during days of operation. For January to May 2024, records indicate there were no visible emission events and no pipe leaks. The wig-wag is a curved piece of duct work with a nozzle on the end that is pointed downward and swung side-to-side as it's filling chips in the rail car. Leaks are noted as deviations in the semiannual and annual compliance reports. The facility has explained in the past that this occurs due to the conveyed material being abrasive and wearing down the piping. It is known that particulate matter moving at high velocities can cause ductwork abrasion especially at areas with sharp shifts in direction such as elbows. When leaks are detected, the blow line is shut down immediately and repaired before returning to service (SC VI.2).

PotlatchDeltic has a fugitive dust plan for EU-PNEUMATICLINE (SC III.1). The plan includes requirements of keeping chips on an impervious surface, sweeping and maintaining the chip pile,

visible emission checks, and corrective actions in the event of a malfunction. During the inspection, visible emissions from a sawdust storage pile and transfer point were observed by AQD staff. It was noted that the storage pile and transfer point were not included the facility's fugitive dust plan. AQD staff explained to the facility that the fugitive dust plan will need to be updated to include all sources of fugitive dust.

EU-GENERATOR

This emission unit is a 389 HP diesel-fueled emergency engine with a manufacture year of 2013. A certificate of conformity with the Clean Air Act of 1990, for engine family DFPXL08.7TR3, is maintained on file. The facility also holds the manufacture certification of compliance with the applicable emission limitations contained in the federal Standards of Performance for New Stationary Sources (NSPS) 40 CFR Part 60, Subpart IIII. Generac, the manufacture of the engine, certifies the engine to meet 0.5 Grams/KW-hr for CO, 3.5 Grams/KW-hr for NOx + NMHC, and 0.13 Grams/KW-hr for PM (SC VI.1). These emission rates show compliance with the emission limitations outlined in SC I.1-3.

PotlatchDeltic also records the hours of operation during non-emergencies on a monthly and 12 month rolling time period basis. The 12-month rolling total hours of usage through May 2024 was 16.5. (SC VI.2).

Fuel supply records indicate the fuel is #2 ultra-low sulfur diesel (SC VI.3). Ultra-low sulfur diesel is required to have sulfur content less than 15 ppm (SC II.1). According to the 2023 MiEnviro Emissions Report, the emergency engine burned 110 gallons of fuel oil.

During the inspection, the hour meter read 171.3 hours and the engine was not in operation.

FG-WOODBOILERS

EU-WOODBOILER1 and EU-WOODBOILER2 are both Hurst boilers, model number HYB-4000-150-WF, with a maximum heat input capacity of 28.7 MMBtu/hr and a steam flow rate of 20,700 lb/hr. Each boiler is equipped with multicyclones to control PM emissions (SC III.1 and IV.1). The boilers are fired primarily by waste wood that is generated on-site as a byproduct from lumber production. Collected wood waste is augured into the boilers via screw conveyor to provide continuous and uniform fuel feed.

EU-WOODBOILER1 and EU-WOODBOILER2 were both operating and producing steam during the time of inspection. Boiler #1 was running at a steam production rate of 13,180 lb/hr and Boiler #2 was running at a steam production rate of 13,620 lb/hr. Bark from processed logs was observed in the fuel bin (SC II.1). The multicyclones for each boiler were operating to control PM emissions (SC IV.1). The inlet to the multicyclone for Boiler #1 was measured at -0.4 and the outlet was at -0.9 for a differential pressure of 0.51 in. WC. The inlet to the multicyclone for Boiler #2 was measured at -0.20 and the outlet was measured to be -1.20 for a differential pressure of -1.0 in. WC. No visible emissions were observed from the stacks of FG-WOODBOILERS. Each boiler is equipped with a digitally controlled oxygen trim system to ensure an optimal air to fuel ratio is maintained for efficient combustion. Each boiler is also continuously monitored from the boiler operator room to ensure there are no visible emissions.

The wood boilers have emission limits for benzo(a)pyrene, CO, and PM. Testing is required every five years to determine compliance with these emission limits and to determine emission rates in lb/MMBtu and lb/hr for CO and PM, and in micrograms per cubic meter and lb/hr for benzo(a) pyrene. EU-WOODBOILER1 was last tested in November 2023 and was determined to be in compliance with the emission limits established in SC I.1, 2, 4, 5, 7, and 8 (SC V.1). EU-WOODBOILER2 was tested in January 2024 and was found to be out of compliance with the PM emission limits established in SC I.7 and 8. The cause of the excess emissions was determined to be a hole in the multicyclone control for the boiler. After the multicyclone was replaced, subsequent testing in February 2024 showed compliance with PM emission limits. Using equations from Appendix 7 in the ROP and emission factors from the most recent stack test, the facility is required to calculate and record CO, PM, and benzo(a)pyrene emissions in tons per year. Emission factors, from the 2023-24 stack tests, that are used in the 12-month rolling calculations are outlined in the table below.

Pollutant	EU-WOODBOILER1	EU-WOODBOILER2	Units
CO	0.109	0.32	lb/MMBtu
PM	0.15	0.15	lb/MMBtu
Benzo(a)pyrene	3.8E-05	2.0E-06	lb/hr

The boilers have material limits that allow only unpainted and untreated wood products, and no more than 2 gallons per hour of spilled waste fuels including oil, hydraulic fluid, antifreeze, and spent boiler chemicals from the collection of on-site spill cleanups and floor sweeps.

PotlatchDeltic is required to keep records of the type and amount of waste fuels burned in the boilers. Records provided show the last use of waste fuels in the wood boilers to date occurred in 2022. During the days that these waste fuels were burned, the burn rates were all less than 2.0 gal/hr (SC II.3 and VI.1).

Records of the amount of wood fuel burned each month are to be maintained, and a YTD value is maintained throughout the year. As of May 2024, the YTD total for FGBOILERS was 15,601 tons of fuel burned. (SC VI.2).

The facility calculates and records the monthly emissions by multiplying the fuel heating value with the given pollutant emission factor and the monthly fuel usage for a given boiler. A 12-month time period is summed to show a ton per year value. The records provided demonstrate compliance with the emission limits contained in SC I.3, 6, and 9.

The wood-fired boilers are required to install and maintain primary and secondary multicyclones (SC IV.1). A multicyclone is a mechanical collector that uses centrifugal force to control PM emissions by collecting fly ash particles from the flue gas before being emitted to the atmosphere. A differential pressure gauge is required to be installed across each multicyclone to monitor the performance of the control device. The facility is required to record the differential pressure across the multicyclones once per shift. If the differential pressure is less than -3.0 or greater than 3.0 in. WC, personnel must immediately notify their supervisor and the maintenance department. From records provided, the differential pressure appears to be staying within the optimal range of greater than -3.0 and less than 3.0 in. WC (SC VI.4).

Records of the most recent boiler tune-up reports were provided. A tune-up for Boiler #1 was conducted on 10/03/2023. The CO readings before and after were 264 ppmv and 16.21 ppmv. The inspector noted the air to fuel ratio was adjusted. A tune-up for Boiler #2 was conducted on 10/05/2023. The CO readings before and after were 596 ppmv and 200.9 ppmv. The inspector noted the under-fire air dampers and air to fuel ratio were adjusted.

FG-DRYKILNS

Rough green lumber is transported to one of four dry kilns after being cut to final stud length. Kilns 1-3 are indirect heated by steam, while Kiln 4 is direct heated by a natural gas burner. Wood is dried to a target moisture content of 14% for kilns 1-3 and 15% for kiln 4. Each kiln is equipped with wet bulb monitors to prevent the over-drying of wood which can result in warping, increased HAP and VOC emissions, and lost product. Wood species dried in the kilns include jack pine, red pine, spruce, balsam, white pine, and tamarack. This flexible group contains a VOC

emission limit of 176.8 tpy, and two material limits of no more than 210,000,000 BF/yr of red pine dried and 220,000,000 BF/yr of total wood dried.

The facility is required to track the type and amount of each wood species dried per calendar month and on a 12-month rolling time period basis in FG-DRYKILNS. For May 2024, the 12-month rolling total consisted of 18,475,662 BF of jack pine, 138,701,787 BF of red pine, 20,986,431 BF of spruce, and 246,114 BF of Balsam were dried (SC II.1 and VI.2). This equates to a 12-month rolling total of 178,409,994 BF/yr dried in FG-DRYKILNS (SC II.2).

VOC mass emission calculations are also required on a monthly and 12-month rolling basis for FGDRYKILNS. The facility is required to provide the VOC emission factor (in lbs carbon per amount of board feet) for each wood species dried. The table below outlines the emission factors the source uses to calculate VOC mass emissions from lumber dried. These emission factors were results from the June 2014 kiln performance tests.

Species	Jack Pine	Red Pine	Spruce	Balsam
Emission Factor (lbs C/MBF)	1.26	1.47	1.15	0.60

The facility maintains monthly VOC emissions and 12-month rolling emission values based on these emission factors and the amount of each wood species dried each month. For May 2024, the 12-month rolling VOC emissions total from FG-DRYKILNS was 125.7 tons (SC I.1).

FG-PLANERSYSTEM

After rough green lumber is kiln dried, the lumber is dimensioned with a high-speed planer and three end trimmers. Shavings are loaded into semi-truck trailers and trucked off site. The emission limitations for PM from FG-PLANERSYSTEM are subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR Part 64. This flexible group has a control device and potential pre-control emissions of PM greater than the major source threshold level. The emissions units EU-PLANER, EUENDTRIMMER1, EU-ENDTRIMMER2, EU-ENDTRIMMER3, EUTRAILERS make up FGPLANERSYSTEM and exhaust out a single point from a baghouse. Baghouses act as capture/collection systems for air pollution control and product recovery by separating wood residue from the airstream of pneumatic handling systems.

The planer system is not allowed to operate unless the baghouse is installed, maintained, and operating properly (SC IV.1). A differential pressure gauge is required to be installed to monitor the performance of the baghouse (SC IV.2). The differential pressure across the baghouse is required to be maintained between 0.1 to 6.0 in. WC. This differential pressure range was established during the March 2014 performance test on the baghouse and is correlated to PM emissions. The indicator range of 0.1 to 6.0 in. WC ensures compliance with PM emissions. In addition to monitoring the differential pressure across the baghouse, PotlatchDeltic is required to perform non-certified visible emission observations on the baghouse once per calendar month.

Records were provided of monthly visible emission observations for the period January through May 2024. The records included the date, time, name of observer, whether the reader is certified to conduct Method 9 readings, and the status of visible emissions. From the records provided, there were no visible emissions observed from FG-PLANERSYSTEM for this time period.

The differential pressure across the baghouse is to be recorded once per day during operation. Records provided show the differential pressure being recorded during each day of operations. The exhaust from the baghouse is also inspected, along with checks on the pulse jet to make sure cleaning of the baghouse is operating properly (SC VI.3).

Monthly inspection and maintenance logs were provided for the baghouse in FG-PLANERSYSREM. The tube sheet (clean side) is inspected for dust accumulations, along with rips or loose seals. Each inspection section of the baghouse is graded on a "Good", "Fair", or "Poor" basis. Notes are provided if parts are replaced. Throughout January to May 2024, all parts are reported to be in good condition.

PotlatchDeltic is required to submit semiannual CAM downtime incident summary reports and excursion/exceedance summary reports. There were no exceedances/excursions and downtime incidents during 2023 (SC VII.4 and 5).

During the inspection, the baghouse was inspected for leaks and malfunction. There were no leaks in the duct work and the baghouse appeared to be operating properly. The Magnehelic gauge was inspected for the differential pressure across the baghouse (SC IV.2). The gauge read 0.6 in. WC at the time of inspection (SC III.1). A differential pressure of 0.6 inches of water indicates the baghouse compressor is operating properly by cleaning the bags regularly and not allowing excess buildup of material. With no visible emissions observed from the baghouse and the differential pressure gauge reading above 0.1 inches of water, the bags inside seem to be in satisfactory condition (SC IV.1).

FG-FIREPUMPS

The facility contains two 231 HP compression ignition (CI) fire pump engines for emergency situations. These engines are subject to 40 CFR Part 63, Subpart ZZZZ. Both engines are equipped with a non-resettable hour meter (SC IV.1). From the 2023 MiEnviro Emissions Report, EU-FIREPUMP1 operated a total of 11.3 hours and EU-FIREPUMP2 operated for a total of 7.8 hours. The engines burned a combined 113.6 gallons of fuel oil. During the inspection, the hours of EU-FIREPUMP1 were 85.7 and 44.6 for EUFIREPUMP2.

MISCELLANEOUS

The facility considers the following equipment exempt from permitting.

Emission Unit ID	Emission Unit Description	Rule 212(4) Citation	Rule 201 Exemption Citation
EU-PARTSWASHER	Four parts washers with an air/vapor interface of less than 10 square feet	R 336.1212(4)(b)	R 336.1281(2)(h)
EU-GASOLINETANK	500-gallon gasoline tank that is vented to the atmosphere	R 336.1212(4)(c)	R 336.1284(2)(g)
EU-SAWFILE	Saw filing system equipped with a dust collection/filtration system	R 336.1212(4)(d)	R 336.1285(2)(l)(vi)
EU-KILN4BURNER	20 MMBtu/hr natural gas-fired burner used to direct-fire kiln 4	R 336.1212(4)(i)	R 336.1291(2)

Compliance

Based on this inspection, PotlatchDeltic Land & Lumber appears to be in compliance with MI-ROP -N5940-2019a, PTI No. 145-23, and all other applicable air pollution control rules and federal regulations. It was conveyed to the facility that no violations were observed during the on-site inspection but that the facility's fugitive dust plan and malfunction abatement plan will need to be updated.

In response to observing fugitive dust emissions from the outdoor sawdust transfer and storage pile, the facility's fugitive dust plan will need to be updated to cover source-wide fugitive dust emissions. Following the violation notice issued on April 1, 2024, the malfunction abatement plan will need to be updated to reflect the new quadrennial replacement schedule for the multicyclones for FG-WOODBOILERS. to

The facility's two Hurst wood-fired boilers.

Fugitive dust observed from the sawdust transfer and stockpile.

NAME _____ DATE 8-12-2024 SUPERVISOR _____