DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

N131531257

| FACILITY: LOUISIANA-PACIFIC CORP SAGOLA PLANT | | SRN / ID: N1315 |
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| LOCATION: N8504 HIGHWAY M-95, SAGOLA | | DISTRICT: Upper Peninsula |
| CITY: SAGOLA | | COUNTY: DICKINSON |
| CONTACT: Hans Baij , Plant Environmental Manager | | ACTIVITY DATE: 09/16/2015 |
| STAFF: Joel Asher | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR |
| SUBJECT: Scheduled inspection | n of facility. | |
| RESOLVED COMPLAINTS: | | |

This facility has been scheduled for an annual compliance inspection in FY2015. It has been two years since a Full Compliance Evaluation has been done.

On 9/16/2015, I conducted an unannounced inspection of LP Sagola. My contact was the plant environmental manager, Mr. Hans Baij.

The main focus of this inspection was to look at the record keeping requirements that are specified in the facility's ROP, MI-ROP-N1315-2013. The daily record keeping that is required is primarily conducted by the shift operators. Once the operator records the data it is collected by the shift manager. Most of the information is then sent to either Mr. Baij or the environmental technician, Mr. Joe Ball.

Visible emission readings are required to be conducted on the baghouse dust collectors for the EUFORMING (VI.1), FGSANDER1 (VI.1), FGSANDER1 (VI.1), FGMAIN1 (VI.1), and FGMAIN3 (VI.1). Random dates were selected for determination and verification compliance visible emissions readings are being conducted. The dates of 1/15/2015, 4/23/2015, 7/11/2015, and 8/2/2015 were selected. Mr. Baij stated daily compliance records for the latest two months are kept in his office. Any records older than two months up to 6 years are kept in a storage area near the product storage warehouse. Records are purged after 6 years. The records for July and August were found to be kept in the office. Mr. Baij showed the me the records storage area where I observed the required records for the January and April dates. All required data was found.

EUTOH-WOOD VI.2 requires the facility to keep monthly and 12-month rolling records of the tons of dry fuel burned in the Geka Thermal Oil Heater. This is done by recording the number of 'pushes' the unit conducts. Dry fuel is pushed onto the grates of the heater. It has been calculated how much fuel is fed to the heater by each push. The records show the number of pushes which are calculated into tons and recorded on a daily basis. This is recorded daily by the operators and entered into the data system. At the end of each month the information calculates a monthly total. This monthly total is entered into the calculation for the 12 month rolling calculation. SC II.2 limits the facility to 30,660 tons of dry fuel per 12 month rolling time period. Mr. Baij stated it is unlikely the facility would be able to burn this much material in a 12 month period.

Throughout the ROP the facility is required to keep records of an inspection and maintenance program. This is done through the facility's EAM program. The EAM is a system that tracks all maintenance activities, both scheduled and repair activities. Mr. Ball was able to show how the system works and how entries are made into the system. If needed information can be sorted to show all activities done on a single piece of equipment or which activities are conducted on a specific date. A work order is created for all needed activities. As the work order is completed it is entered and the system updated to show completed activities. The program appears to be very efficient and effective.

No complaints have been received regarding this facility. No issues of non-compliance were observed during this inspection.

This facility was found to be in compliance with their ROP, MI-ROP-N1315-2013, and the Air Pollution Control Rules.

NAME SE

DATE 9/18/15 SUPERVISOR_

SUPERVISOR_____