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

N344971349

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| **FACILITY:** OTTAWA FOREST PRODUCTS INC | | **SRN / ID:** N3449 |
| **LOCATION:** 1243 WALL ST, IRONWOOD | | **DISTRICT:** Marquette |
| **CITY:** IRONWOOD | | **COUNTY:** GOGEBIC |
| **CONTACT:** Don Jarvenpaa , | | **ACTIVITY DATE:** 03/15/2024 |
| **STAFF:** Joe Scanlan | **COMPLIANCE STATUS:** Compliance | **SOURCE CLASS:** MINOR |
| **SUBJECT:** Unannounced activity to determine compliance with Michigan Air Pollution Control Rules. | | |
| **RESOLVED COMPLAINTS:** | | |

## 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

**Ottawa Forest Products Inc. is a manufacturer of pre-cut pallet components and hardwood dimension lumber, located in Ironwood, Gogebic County. The Ironwood Mill processes a variety of hardwoods including Red Oak, Aspen, and other Mixed Hardwoods. The company provides runner/stringer stock from 1” to 2” thick (typical sizes are 1-1/8, 1-1/4, 1-3/8) and board stock from 7/16” and up. Production has been mainly the 48" x 40" pallet production market; however, the mill also does custom dimensions for large or small orders.**

## PROCESS DESCRIPTION

**Sawmills are facilities that process logs into lumber. Operations associated with this sawmill includes debarking logs, milling lumber, production of wood waste, and loading of lumber and wood waste.**

## EMISSIONS

**Particulate matter (PM) from wood processing and wood waste handling are the primary emissions of concern at Ottawa Forest Products Ironwood facility. PM emissions, also referred to as fugitive emissions, from within the yard and track out from the facility can also be a concern.**

## EMISSIONS REPORTING

**This facility is not required to report emissions.**

## COMPLIANCE HISTORY

**The facility has not had any previous compliance issues.**

## REGULATORY STATUS

**Currently no equipment on site is subject to permitting under Michigan Air Pollution Control Rules. There is no kiln on site at this facility. The facility heats with naturals gas space heaters.**

**This facility previously operated a dust collection system that was permitted under PTI No. 385-92. Following a catastrophic fire in 2011, the facility was rebuilt in 2012 and now utilizes a turret-style baghouse that is exempt from permitting. PTI No. 385-92 was voided in 2012.**

**INSPECTION**

**On March 15, 2024, AQD district staff Joseph Scanlan (myself) conducted a compliance inspection of Ottawa Forest Products facility located in the Industrial Park east of downtown Ironwood. The main office is in the mill building. Because the owners of the facility were not on site, office staff contacted employee Don Jarvenpaa, who escorted me throughout the facility as we discussed potential sources of air emissions.**

**No activity was taking place in the log yard at the time of the inspection, and no fugitive dust emissions were observed leaving the property boundary at the time of the inspection. If the ground should become too dry, this dirt log yard is likely to be a source of fugitive particulate matter emissions when loaders and haul trucks travel throughout the log yard. The yard should be observed routinely during shifts to ensure fugitive dust is under control and that high traffic areas are kept adequately wet or controlled with dust suppression materials.**

**Sawmill operations occur within the confines of the main structure, except for log debarking. From the yard, raw logs are loaded onto a roller conveyor on the west side of the wood fines storage bunkers. Logs are conveyed to the debarker, and hogged bark is sent to a storage area on the other side of the wood fines storage bunkers. This storage area for hogged material is fairly protected from wind, between the wood fines storage bunkers and the mill building. Debarked logs then enter the mill for processing. If there is excess hogged material in the storage area, hogged material is moved with a front-end loader and stored in other areas of the yard where the material is still accessible for loading trucks. Hogged material is transferred to trucks via the loader.**

**Wood waste from milling operations inside the plant are collected using a cyclone and pneumatic dust collection system and sent to a baghouse located outside the mill building. In 2012, a baghouse with 120 bags that utilizes a turret cleaning system was installed and is located outside of the west side of the mill building. A turret baghouse uses a rotating turret to force air into bag filters in the opposite direction of the normal flow to clean them. This reverses the flow of air through the bag filters, causing them to expand and dislodge dust into a hopper. The turret rotates at 2 revolutions per minute. At any one time 75% of the bags are utilized while 25% are being cleaned. Collected material drops into a screw conveyor and is conveyed to uncovered storage bunkers. The facility inspects the baghouse annually and has spare bags on site. A magnehelic gauge is used to monitor baghouse efficiency and a warning light displays if the unit is not functioning properly. Because milling process exhaust utilizes an appropriately designed and operated fabric filter collector that is externally vented, the baghouse is considered exempt from needing a Permit to Install per Rule 285(2)(l)(vi)(C).**

**Other wood waste from the mill is sorted on a chip screen in a small, covered, three-sided building adjacent to the northwest corner of the building and debarking area. Wood fines are discharged from one end of the chip screen and sent out of the shed to the uncovered wood fines storage bunkers via an enclosed screw conveyor. Larger materials are discharged from the other end of the chip screen and sent out of the shed to the hogged bark conveyor and then deposited**

**in the hogged bark storage area. A small amount of particulate matter emissions was observed leaving the general area; however, this area has a potential risk for being a larger source of windblown particulate emissions during high wind events. The facility should be diligent in keeping wood fines within the confines of the storage bunkers to avoid windblown emissions of particulate matter. Wood waste is sold for boiler fuel to various sources.**

**Wood fines were observed on the ground near the storage bunkers, but truck load-out did not occur during the inspection. Trucks are loaded using a front-end loader. Fugitive emissions may be generated during loading or from the trucks as they exit the yard. Haul drivers need to ensure that the storage bin opening is clean and the truck cover secure before the truck leaves the storage bunkers and yard.**

**CONCLUSION**

**The debarker, wood fines storage bunkers, and hogged waste storage area should be covered with a roof or in a fully enclosed building. All vehicle work areas should be watered as necessary, treated with effective dust suppressants, covered, or paved and cleaned as necessary to achieve maximum, reasonable control of fugitive dust emissions. Wood waste haulers need to ensure that truck covers, and trailer doors are secure before the truck leaves the storage bunkers. Track-out from haul trucks leaving the yard should be monitored and addressed as necessary to prevent fugitive emissions off-site.**

**While the facility is exempt from permitting, it is located on a small lot in an industrial park and has high potential to impact the surrounding roadways and businesses. It is recommended that Ottawa Forest Products design and implement a Fugitive Dust Control Plan to address these issues for the Ironwood Mill.**

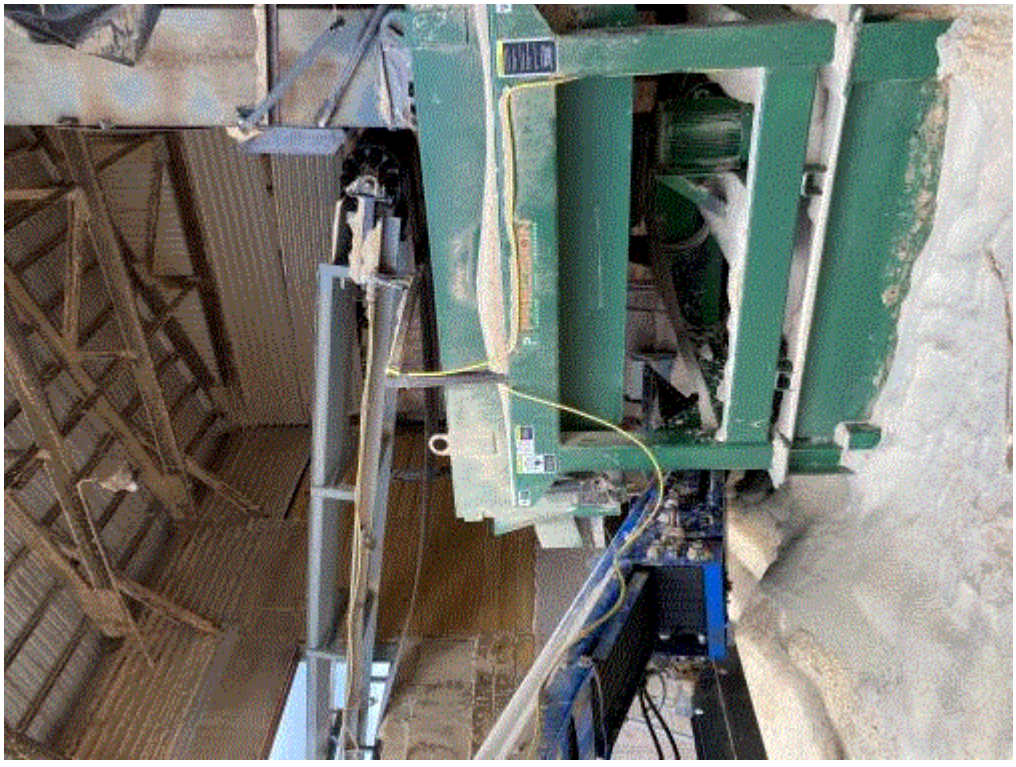

**Image 1(OFP1) :** Chip Screen

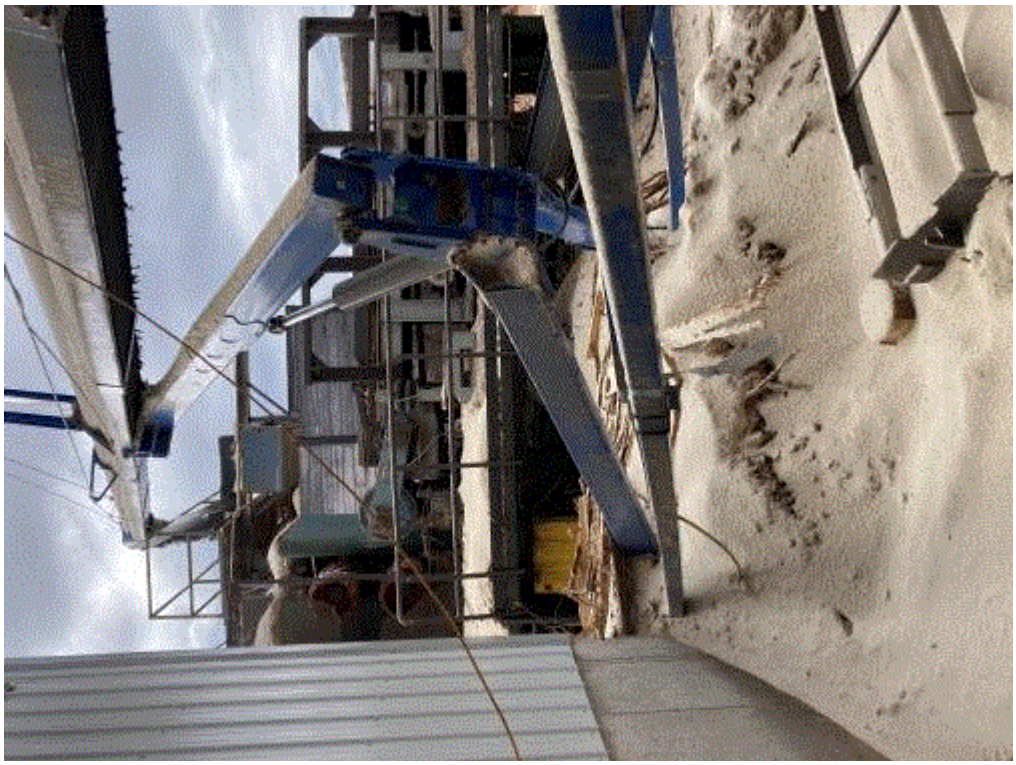

**Image 2(OWP2) :** Excessive fines

**Image 3(OWP3) :** Fines storage bunkers

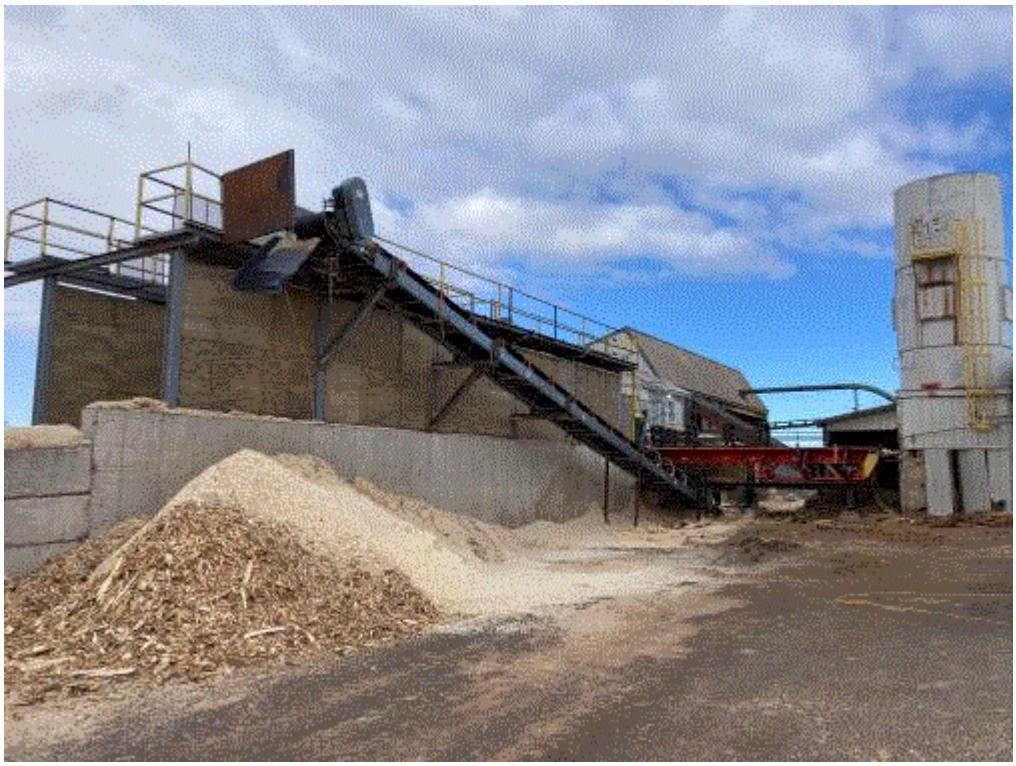

**Image 4(OWP4) :** Hogged materials

NAME _____ DATE 5-3-2024 SUPERVISOR _____