

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N594032263

FACILITY: POTLATCH LAND & LUMBER LLC.		SRN / ID: N5940
LOCATION: 650 A AVENUE, GWINN		DISTRICT: Upper Peninsula
CITY: GWINN		COUNTY: MARQUETTE
CONTACT: LAUREN LUENEBURG , ENVIRONMENTAL COORDINATOR		ACTIVITY DATE: 11/23/2015
STAFF: Joel Asher	COMPLIANCE STATUS: Compliance	
SUBJECT: Source wide compliance inspection.		SOURCE CLASS: MAJOR
RESOLVED COMPLAINTS:		

On 11/23/2015 I conducted an inspection of Potlatch Land and Lumber, LLC in Gwinn. My contact was Ms. Lauren Lueneburg, Environmental Coordinator.

A review of the facility's Title V ROP, MI-ROP-N5940-2013 was conducted.

SOURCE-WIDE CONDITIONS

The ROP contains SOURCE-WIDE CONDITIONS for HAP emissions. SOURCE-WIDE CONDITIONS VI.2 requires records on a monthly basis for the quantity, emission factor, and emission calculations for individual and aggregate HAPS. All records are kept as required. The facility maintains a large spreadsheet to conduct all calculations. Daily boiler operator logs are filled out by the boiler operators. The hours of boiler non-operation are subtracted from the total possible operating hours in the month (assuming the boilers run 24/7/365). This provides the total hours of boiler operation during the month. The spreadsheet automatically calculates the quantity of HAPS emitted for the specific month. SOURCE-WIDE CONDITIONS VI.1 requires all calculations to be completed by the 15 of the following month. This appears to be completed appropriately as this inspection was on the 23 and the calculations were completed.

SOURCE-WIDE CONDITIONS IX.1 requires the facility to maintain a Malfunction Abatement Plan (MAP). The facility appears to have all the appropriate data on site. The material will be reorganized to provide a single document with all appropriate information.

The facility maintains a fugitive dust control plan as required in SOURCE-WIDE CONDITIONS IX.2.

EU-GASBOILER

EU-GASBOILER VI.1 specifies the facility maintain records of the amount of natural gas combusted during each calendar month. Daily the boiler operators enter the cubic feet of natural gas used in each boiler. Random dates were selected to verify the data entry. It was observed for the following dates, the following cubic feet of natural gas was burned: 1/7/2015, 509; 3/13/2015, 339; 7/3/2015, 254; and 9/4/2015, 241.

EU-CONVEYOR

Fugitive dust emissions are controlled as specified in the fugitive dust control plan as specified in EU-CONVEYOR III.1.

EU-PNEUMATICLINE

EU-PNEUMATICLINE is included in the facility's fugitive dust control plan as specified in EU-PNEUMATICLINE III.2. EU-PNEUMATICLINE III.3 limits the use of the truck bin to less than 5075 hours per year. Calculations show this equivalent to continuous operations while the mill is in operation. The truck bin is not utilized in the winter months due to the potential of the wet wood chips freezing in the bin. Therefore the facility has no issues with meeting the hourly operation restrictions.

EU-PNEUMATICLINE V.1 specifies the facility conduct performance testing every five years. Ms. Lueneburg stated the facility plans to conduct testing in the summer of 2016.

Records were checked to verify the daily hours of operation are recorded as specified in EU-PNEUMATICLINE VI.1.

EU-GENERATOR

An hour meter is attached to the 200 kW generator used for emergencies. All hours of operation are monitored and logged as specified in EU-GENERATOR VI.1. Verification of records show the unit was operated for 3.6 hours in 2014 and 9.6 hours so far in 2015. The unit is used in the event of a power failure.

EU-GENERATOR VI.3 requires the facility to maintain fuel supplier certification records to verify the sulfur content of less than 15 ppmw. A copy of the fuel certification was provided and is attached to this report. Records show the last fuel purchased was on 7/1/2013. The MSDS sheet verifies the fuel to contain a sulfur content of less than or equal to 15 ppm.

FG-WOODBOILERS

FG-WOODBOILERS II.1 limits the facility from burning any wood, wood residue, or wood waste which is painted or treated with wood preservatives. The facility has a Standard Operating Procedure (228 Spill Absorbent Disposal) which states in section 7.2 "No wood, wood residue or wood waste which is painted or treated with wood preservatives shall be burned in the boilers." Ms. Lueneburg verified that no treated or preserved wood is burned.

FG-WOODBOILERS II.3 limits the amount of waste fuels (wood waste used to clean up spills) burned to no more than 2 gallons per hour. This limitation is addressed in the Standard Operating Procedure (228 Spill Absorbent Disposal) which states this limit in section 8.2.1. Records are maintained regarding any spills and cleanups at the facility.

As required in FG-WOODBOILERS III.2 , the differential pressure is monitored across the multiclones. There is a gauge that is pre-primary and a gauge that is after the secondary. Records of the once per shift readings are maintained as required in FG-WOODBOILERS VI.4. The dates of 1/7/2015, 3/13/2015, 7/3/2015 and 9/3/2015 were observed. All required records are maintained.

The HAP emissions testing required in FG-WOODBOILERS V.1 was conducted in March of 2014. This testing will not need to be redone until the next 5 year cycle.

Records of the wood fuel combusted in the boilers is also kept as required in FG-WOODBOILERS VI.2. The same dates as above were evaluated and the following data was observed (date, amount in Boiler #1, amount in Boiler #2): 1/7/2015, 49.2 tons, 61.9 tons; 3/13/2015, 65.5 tons, 42.9 tons; 7/3/2015, 57.1 tons, 54.4 tons; 9/3/2015, 51.2 tons, 47.4 tons.

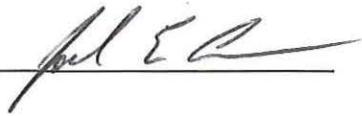
FG-DRYKILNS

As required in FG-DRYKILNS VI.1 and 2, records are maintained in a large database for all wood species, board feet, VOC emissions, etc... on a monthly basis. This is updated by the 15th of the month for the data for the previous month.

FG-PLANERSYSTEM

Magnahelic readings are conducted once per day as required in FG-PALNERSYSTEM VI.2. These are recorded in a large database. All previous listed dates were examined and records were maintained. Visible emissions readings are also conducted and records maintained as specified in FG-PLANERSYSTEM VI.1.

This facility is found to be in compliance with MI-ROP-N5940-2013. No complaints have been received regarding the facility and no non-compliant issues were observed.

NAME 

DATE 12/1/15

SUPERVISOR _____