

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

N775325103

FACILITY: FRAME HARDWOODS INC		SRN / ID: N7753
LOCATION: 740 WEST INDUSTRIAL DR, CHELSEA		DISTRICT: Jackson
CITY: CHELSEA		COUNTY: WASHTENAW
CONTACT:		ACTIVITY DATE: 05/08/2014
STAFF: Glen Erickson	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Follow-up inspection to 4-28-14 inspection, with owner David Frame to complete scheduled inspection.		
RESOLVED COMPLAINTS:		

Scheduled inspection with owner David Frame. This inspection follows-up on my 4-28-14 inspection where I observed fugitive emissions from sawdust truck loading operations at facility.

Briefly discussed what I had observed of the 2 truck loading operations at his facility on 4-28-14. On that day the wind was gusting at 30-35 mph. VEs of up to 50% opacity, at times, was observed coming from the downwind end of the south located sawdust loading enclosure, where the truck is only about ½ within enclosure during loading operations.

The sawdust loading operations at the north located truck enclosure was not as excessive as at the south located enclosure, perhaps due to the north located enclosure being about twice as long, so that the entire truck bed is within the enclosure during most of the loading.

We first went to the south located enclosure which is the load-out for the silo connected to the Torit cylindrical bag filter which evacuates the ripping and finishing machines located in the south-most building. This bag filter appears to be operating properly, with a pressure drop reading across the filters of 2.0 " w.g. Frame indicated that he recently changed out all of the bags within both bag filters.

I discussed the relevant air quality administrative rules, and the permit exemption applicable to these operations.

Rule 285(l)(vi) exempts from permits equipment for performing various routing, sawing, sanding operations involving wood, among other materials, if the externally vented emissions are controlled by an appropriately designed an operated fabric filter collector...

Rule 370 requires the collection and disposal of air contaminants to be performed in a manner so as to minimize the introduction of contaminants to the outer air.

Rule 901 prohibits the emissions of air contaminants that may cause injurious effects to human health of safety, animal life, plant life of significant economic value or property; or unreasonable interference with the comfortable enjoyment of life and property.

Rule 301 limits visible emissions to an opacity of 20% across a 6-minute average.

I explained to Frame that what I observed on 4-28-14 did not constitute a violation of Rule 301 since what I observed only lasted for 4-5 minutes at most, although if I had witnessed the entire truck loading operation a true 6-minute record could be possible.

Rule 370 requires minimization of the introduction of air contaminants to the outer air, which is quite subjective and without specific measurable parameters.

Rule 901 requires a significant off-site impact to health and/ or welfare, which this situation does not appear to approach, at this time. No off-site residuals were observed, although some sawdust was visible around the truck enclosures, but not near the property line. A specific public complaint alleges negative impacts has not been registered, perhaps because the plant is located in an industrial park, well away from an residential properties.

Finally, Rule 285 requires emissions to be controlled by an appropriately designed an operated fabric filter. In this case, both fabric filters appear to meet this standard, with the only problem associated with the disposal of the collected sawdust.

I asked Frame to propose a corrective action program to me that progressively attempts to improve the sawdust loading operations.

He agreed. He said he couldn't extend the south located enclosure do to the building and driveway configurations which restrict the means that the truck can enter and exit the enclosure.

He said he would attempt to extend the loading chute at the base of the silo, perhaps with an extendable snorkel. He said this is very tricky, and has been attempted before. He has to have 1 of his employees observe each of the truck loading to assure the loaded material does not plug up the dumping chute, so extending the chute is tricky, but perhaps workable.

He also thought that maybe he could extend a small scavenger duct of 6-8 " from collector to directly evacuate the loading enclosure near the dump chute to help mitigate the release of the very fine finishing dust that generates the majority of the visible emissions.

I told him I thought that was a reasonable approach, and that I would periodically monitor the loading operations to see if he has made improvements.

The north located fabric filter, also a cylindrical Torit bag house was operating properly with 2.4 " w.g. pressure drop.

He recently added a new German molding machine that finishes the tongue and groove, tops and bottoms of boards at one pass, helping stay up with his increased business. The indoor air quality was excellent with all of his buildings, with no visible leakages of evacuation ductwork attached to cutting, sanding, molding operations.

Frame indicated that only clean, dry sawdust is evacuated to the bag houses for disposal to a company that turns the dust into wood stove pellets. No coated wood is involved in the sawdust generation and collection. His water-based UV hardwood flooring coating is the last process before the boards are packaged and send to customers.

Consider this facility in compliance with all applicable air regulations, despite the on-going housekeeping type issues.

NAME GLEN ERICKSON

DATE 5-13-14

SUPERVISOR 