

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

P076739723

FACILITY: Pallet Solutions by the Dutch Legacy Company		SRN / ID: P0767
LOCATION: 9932 Northeast Kendaville Road, VESTABURG		DISTRICT: Grand Rapids
CITY: VESTABURG		COUNTY: MONTCALM
CONTACT: David Troyer , Manager		ACTIVITY DATE: 05/01/2017
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Open burning complaint which led to a self initiated inspection of the facility.		
RESOLVED COMPLAINTS:		

Air Quality Division (AQD) staff Adam Shaffer (AS) arrived at the facility the afternoon of May 1, 2017 to follow up on an April 24, 2017 complaint regarding open burning that allegedly occurred at the facility on April 22, 2017. A facility inspection was then completed to follow up on the violation notice (VN) that was issued to Pallet Solutions by the Dutch Legacy Company (Pallet Solutions) on August 17, 2016.

Prior to entering the facility, offsite odor and visible emission observations were completed. No visible emissions were identified; however, a wood odor was identified along the east/northeastern border of the facility. AQD staff met with Mr. David Troyer, Production Facility Manager, upon arrival. The open burning complaint was discussed with Mr. Troyer. Mr. Troyer stated that on April 22, 2017 he had provided a small fire/cookout for his employees. Scrap wood from onsite processes was used for the fire. A small burnt area was observed on the southern portions of the property. No fuel was staged nearby and no ashes of concern were observed. However, open burning rules and regulations, specifically Rule 310, do not allow open burning at commercial businesses. Additionally, the wood that was used for the small fire was scrap wood from producing pallets on site. In a follow up phone conversation on May 10, 2017, this was stated to Mr. Troyer. Mr. Troyer was in agreement with the AQD's conclusions, and no additional fires will be done on site. Based on this, the complaint has been addressed and no further action is necessary at this time.

After addressing the complaint, a full inspection of Pallet Solutions was completed by AS. This included a facility walk through and a closing discussion at the end. Pallet Solutions is a wood pallet producing company. The facility recently obtained a Permit to Install (PTI) No. 187-16 in November, 2016, which includes operation of one 13,000-18,750 cfm range cyclone. The cyclone was recently installed on site, and started operating in early March, 2017. The layout of the facility consisted of one main operations building, a heat transfer building, a storage building and an enclosure for the saw dust captured by the cyclone.

Compliance Evaluation

During operation, large amounts of untreated wood boards are received and stored on site. The type of wood received is hardwoods (ash, maple, oak). At the start of the assembly process, the wood boards are moved via forklift onto an unscrambler machine where they are sorted prior to moving through the wood working processes. Various pieces of wood working equipment including a five head band saw, a notch machine, a nailer machine, a sizer machine, and a chop saw were identified. Several hoods were observed above select wood working machines which are connected to the cyclone. All wood working equipment is considered part of the operations covered under PTI No. 187-16. Piles of saw dust not collected by the fume hoods were observed in the immediate areas of the wood working machines. Mr. Troyer stated that housekeeping practices are completed daily to remove the saw dust. During the inspection cleaning around the woodworking machines was observed being conducted by Pallet Solutions employees.

Pallet Solutions has in place a Malfunction Abatement Plan (MAP) for the cyclone system and a Fugitive Dust Control Plan. After speaking with Mr. Troyer, it appeared that the MAP was being adequately followed. During the inspection, the duct work and cyclone were observed for fugitive emissions. No fugitive emissions were identified escaping from the cyclone and associated duct work. The cyclone is connected to a recently constructed three sided enclosure for storage of collected saw dust. A loading area for transportation of saw dust offsite was observed adjacent to the storage area. The saw dust that is shipped off site is used for farm animal bedding and scrap wood is sold as firewood. Saw dust was observed outside the enclosure, leading up to the loading area. AS advised Mr. Troyer on preventing fugitive dust observed around the loading area, as well as eastern portions of the facility with exposed soil, from migrating offsite. It was stated by Mr. Troyer that they plan to install in May, 2017, a cemented area outside the three sided enclosure to better manage containment of saw dust collected. Additionally, the eastern portions of the facility are planned to be covered with gravel and used for storage of wood products. Based upon overall onsite observations; it appears that Pallet Solutions is following

the Fugitive Dust Control Plan.

Once the wood pallets are finished being constructed they are placed in the heat transfer building. Mr. Troyer explained that all pallets being shipped outside the United States are steam heat treated for approximately 30 minutes at 140°F. This prevents the spread of invasive species to other areas. Three 1,000 gallon propane tanks were observed to the east of the heat transfer building. Two of the tanks are utilized for the heat transfer building along with an associated blower and fans. The third tank is used for a forced air heating unit stated by Mr. Troyer to be in the office area of the main operations building. Steam was observed coming from the entranceway of the heat transfer building. AS suggested to Mr. Troyer that mitigating the escape of steam may reduce odors from traveling offsite.

During the inspection one stack was identified in association to the cyclone in operation on site. An adjustable top was observed on the stack. Though the one stack was not measured, the dimensions appeared consistent compared to the PTI No. 187-16 dimensions listed.

A wrap up discussion was completed following the facility walk through, which included reviewing the completed monthly hours of operation for the cyclone. Since the cyclone started operating in early March 2017, 12-month total rolling emissions were not required at this time. The total number of hours of operation for the month of March 2017 was 130 hours. The April 2017 hours were not totaled up at the time of the inspection; however, Pallet Solutions appears to be keeping track of its operation hours.

NAME Adam E. Steff

DATE 05/25/17 SUPERVISOR [Signature]