Introduction

On the above date, a comprehensive inspection was conducted at Cormark International, LLC. The purpose of this inspection was to determine compliance under the Asheville-Buncombe Air Quality Agency Air Quality Code (AB Air Quality Code). Cormark International, LLC, otherwise known as the facility, operates a warehousing and distribution center for imported exotic lumber. Operation of this facility is granted under permit number 11-895-16A which was issued on May 9, 2016, amended on November 14, 2016, and expires on May 31, 2024. The inspection was conducted by Alex Latta. The facility was represented by Ryan Fisher. The following is a summary of the inspection results:

Safety Equipment / Special Instructions

Steel toed boots, safety vest, and safety glasses are recommended while in the woodworking area around operating equipment. Hearing Protection may be desired if machines are operating.

Permitted Equipment

- ES-1: One (1) woodworking operation with emissions controlled by one (1) baghouse with 2413 square feet of filter area (C-2) and/or by one (1) cyclone with an after-filter baghouse with 842 square feet of filter area (C-1)

ES-1 was observed in operation during the inspection. C-2 was in operation with a pressure drop (PD) of 1.2 in W.C. The facility noted that once the PD reaches around 1.8 in W.C. maintenance activities are triggered.
Permit Conditions:

The following permit conditions were reviewed during this inspection:

- A.1 – The facility is required to operate according to AB Air Quality Code including but not limited to the following specified conditions and any other applicable Local, State, and Federal regulations.

- A.2 – The facility is required to operate the equipment per the specifications submitted in the permit application. Any changes in the permit application specifications or any existing equipment which alter the impact of the facility on air quality may require a permit.

- A.3 – The facility is required to submit an application for any changes or alterations to processes and equipment to AB Air Quality. Failure to do so could result in enforcement action.

- A.4 – This condition requires the permittee to notify the Agency in the event of a name or ownership change.

- A.5 – This condition requires the facility to obtain a new air permit prior to installing and operating sources of air emissions at a site or location not specified in the permit.

- A.6 – This permit does not absolve the facility of any liabilities related to any civil/criminal penalties for violations of AB Air Quality Code prior to permit issuance. The facility shall be subject to enforcement action if the terms of the permit are violated.

- A.7 – This condition requires that the permittee maintain and operate the facility at all times so that the overall reduction in air pollutants, in accordance with applicable standards, is achieved. The facility has developed a maintenance schedule for equipment and is maintaining records of all maintenance. Additionally, the facility is maintaining an inventory of spare parts for equipment. The facility has established standard operating procedures for equipment and is training equipment operators on the procedures. Condition B.6 further discusses the facility's maintenance activities.
• A.8 – This condition requires that the facility notify the Agency in the event of a malfunction. The facility has not experienced any malfunctions during the reporting period.

• A.9 – This condition lists the Agency address that the facility is required to submit any required reports, data, notifications, and requests for renewal.

• A.10 – The facility shall allow authorized Local, State, and Federal representatives on-site for inspection upon presentation of credentials.

• A.11 – This condition requires that the facility pay their annual permit fee on a timely basis. The facility is up-to-date on fee payments. The facility last submitted their fee payment on May 22, 2023.

• A.12 – This condition requires the facility to submit a permit renewal request no later than ninety (90) days prior to permit expiration. The facility’s request was received by the Agency on January 29, 2024.

• A.13 – This permit may be suspended or revoked by the AB Air Quality Board under certain conditions.

• A.14 – This condition requires the facility retain a copy of the permit on the premises. The facility had a copy of their current operating permit on-site.

• B.1 – The previous issue of this permit shall become void with the issuance of this current version. Additionally, the facility’s potential to emit is based on the number of machines on-site. The facility is required to notify the Agency before adding or removing wood finishing equipment and before installing any additional connections to the baghouse. According to the facility’s annual report, in 2023, a 24” Cantek Chop Saw (manual feed) and a Homag Beam Saw were replaced in a like-for-like replacement which does not require a prior notification.

• B.2 – This condition states that ES-1 shall be operated such that adequate duct work and properly designed collectors shall be provided, and ambient air quality standards shall not be exceeded beyond the property line. The facility is using a baghouse and cyclone system to control emissions and minimize fugitive dust.
• B.3 – This condition limits visible emissions from all sources to no more than 20 percent opacity when averaged over a six-minute period. There were no visible emissions observed from ES-1 during the inspection.

• B.4 – This condition states the facility shall take reasonable precautions to reduce fugitive emissions from the facility. The facility captures PM emissions from the woodworking operation through the duct work which routes to the baghouse and cyclone system and is emptied into a roll off dumpster. Fugitive emissions were not observed leaving the site during the inspection.

• B.5 – This condition states that the facility is required to conduct an annual internal and periodic inspections of the baghouse and cyclone and maintain records of these inspections on-site. The facility has an inspection schedule to include daily, weekly, monthly, 3-month, and 6-month inspections with various items being checked more frequently than others based on manufacturers recommendations. The last daily check occurred on April 4, 2024. The most recent 6-month service occurred in March 23, 2024. The facility maintains a log for baghouse and cyclone checks which includes sections for the various checks with notations for weekly, monthly, 3-month, and 6-month maintenance items. Additionally, the inspection log contains a section to discuss any issues noted during the inspection and corrective actions taken. During the service on March 23, 2024, filters were changed in the baghouse. Additionally, the roller chain for the PD Pump manifold was tightened and lubricated during this service.

• B.6 – This condition states that the facility is required to conduct an annual internal, and periodic inspections of the fabric filters and maintain records of these inspections on-site. The facility has an inspection schedule to include daily, weekly, monthly, 3-month, and 6-month inspections with various items being checked more frequently than others based on manufacturers recommendations. The last daily check occurred on April 4, 2024. The most recent 6-month service occurred on March 23, 2024. The facility maintains a log for baghouse and cyclone checks which includes sections for the various checks with notations for weekly, monthly, 3-month, and 6-month maintenance items.
Additionally, the inspection log contains a section to discuss any issues noted during the inspection and corrective actions taken. During the service on March 23, 2024, filters were changed in the baghouse. Additionally, the roller chain for the PD Pump manifold was tightened and lubricated during this service.

- B.7 — This condition states that the facility must submit annual reports to the Agency by February 15th of each year. The facility is submitting annual reports as required. The most recent annual report was received January 29, 2024 and contained all the required information. For 2023, the facility operated for 253 days and produced 663,246 lbs of product. The facility disposed of 165,718 lbs of solid waste, recycled 63,327 lbs of wood shavings, and recycled 10,584 lbs of baghouse collections.

Compliance History:

A notice of deficiency was issued in 2023 for late submittal of the annual report for calendar year 2022. The report was due on February 15 and received on March 22, 2023. As the report was submitted, no further action was necessary and the deviation was resolved.

Conclusion:

Based on the above information, Cormark International, LLC appears to be in compliance with applicable regulations of the AB Air Quality Code. It is recommended that this permit be renewed.

Signature: Alexander Lotito Date: 4/4/2024
Reviewer Signature: Date: 4/26/2024
Director Signature: Date: 5/1/2024