



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

August 17, 2016

Mr. David Troyer, Manager
Pallet Solutions
9932 East Kendaville Road
Vestaburg, Michigan 48891

SRN: U59090184, Montcalm County

Dear Mr. Troyer:

VIOLATION NOTICE

On August 11, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Pallet Solutions located at 9932 East Kendaville Road, Vestaburg, Michigan. The purpose of this inspection was to determine Pallet Solutions' compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and to investigate a recent complaint which we received on August 5, 2016, regarding open burning activities attributed to Pallet Solutions' operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Unpermitted wood-working and sawdust control systems	Rule 201	The process emits air contaminants and no exempting Rule from Rule 201 fits the current plant configuration.
Cyclonic sawdust controls	Rule 910	These air cleaning devices were not operating in a satisfactory manner.

During this inspection, it was noted that Pallet Solutions had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised Pallet Solutions on August 11, 2016, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the wood-working and sawdust control process equipment. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

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During the August 11, 2016 inspection, the AQD staff observed unsatisfactory collection and storage of sawdust from the pallet making process. This conclusion was based on sawdust collections on the main building roof, the top of the cyclone bin, observed visible emissions from the ductwork and bin, the overfull status of the sawdust collection area and general yard conditions. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 7, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Pallet Solutions believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Pallet Solutions. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Stephen J. Lachance
Environmental Quality Specialist
Air Quality Division
616-356-0239

Enclosure

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ