



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
BAY CITY DISTRICT OFFICE



PHILLIP D. ROOS  
DIRECTOR

May 7, 2024

Robert Yoder  
Northern Mat  
2495 East Rock Road  
Clare, Michigan 48617

SRN: U182401766, Clare County

Dear Robert Yoder:

**VIOLATION NOTICE**

On April 30, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Northern Mat located at 2495 East Rock Road, Clare, Michigan. The purpose of this inspection was to determine Northern Mat's 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 was received on March 19, 2024, regarding fugitive sawdust attributed to Northern Mat's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Sawdust from the onsite sawmill was being vented uncontrolled to the ambient atmosphere.	Rule 336.1201, also known as Rule 201.	Processes with air emissions are required to obtain a Permit to Install (PTI) unless they meet the requirements of one or more PTI exemption rules listed in the PTI Exemption Handbook. With the sawdust being vented uncontrolled to the ambient atmosphere, the process currently does not qualify for one or more PTI exemption rules.

During this inspection, it was noted that Northern Mat had installed and commenced operation of an unpermitted sawmill at this location. The AQD staff advised Northern Mat on April 30, 2024, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451. Rule 201 requires processes with air emissions to obtain a

Permit to Install (PTI), unless the process meets the requirements of one or more PTI exemption rules listed in the AQD PTI Exemption Handbook. With sawdust from the sawmill being vented uncontrolled to the ambient atmosphere, the process currently does not meet the requirements one or more of the PTI exemptions.

A program for compliance may include a completed PTI application for the sawmill process equipment. An application form is available by request, or at the following website: [www.michigan.gov/air](http://www.michigan.gov/air). Alternatively, changes could be made to the process to ensure the process meets the requirements of one or more of the PTI exemption rules.

A common PTI exemption rule utilized by sawmills is Rule 285(2)(I)(vi), which states the following.

Rule 285

- (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.
- (2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:
  - (I) The following equipment and any exhaust system or collector exclusively serving the equipment:
    - (vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:
      - (A) Equipment used on a nonproduction basis;
      - (B) Equipment that has emissions that are released only into the general in-plant environment;
      - (C) Equipment that has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 28, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Nathanael Gentle at EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708, or email [GentleN@Michigan.gov](mailto:GentleN@Michigan.gov), or fax 989-891-9237; and submit a copy to Jenine Camilleri,

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Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan  
48909-7760.

If Northern Mat 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 violation cited above and for the cooperation that was extended to me during my inspection of Northern Mat. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink that reads "Nathanael Gentle". The signature is written in a cursive, flowing style.

Nathanael Gentle  
Environmental Quality Analyst  
Air Quality Division  
989-778-0025

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Gina McCann, EGLE