



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

January 16, 2019

Mr. David Miotke, President and Owner  
St. Clair Packaging, Inc.  
2121 Busha Highway  
Marysville, Michigan 48040-1943

SRN: N8239, St. Clair County

Dear Mr. Miotke:

**VIOLATION NOTICE**

On January 04, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of St. Clair Packaging, Inc. (Packaging) located at 2121 Busha Highway, Marysville, Michigan. The purpose of this inspection was to determine Packaging'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.

During January 04, 2019, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Central Boiler Company Pallet Burner wood stove (Pallet Burner).	Rule 336.1301 <sup>β</sup> (Standards for density of emissions: 336.1301(1)(a) A six-minute average of 20% opacity, except for one six-minute average per hour of not more than 27% opacity.	Packaging's Pallet Burner visible emissions via its flue gases stack exceeded 20% opacity standard.
<sup>β</sup> On January 4, 2019, at 12:40 p.m., AQD observed visible emissions (VE) using US EPA Reference Method 9. Opacity readings up 85% and six-minute average of 80% were read. The high opacity emissions tapered off, after 20-30 minutes of adding wood pallets fuel to the burner, to about 10% opacity when wood flame fully developed. Newer wood stove technologies (Central Boiler Company Classic Edge 550), with sophisticated combustion controller and with secondary combustion chamber, for smoke (unburnt fuel) can practically eliminate smoke. Based upon combustion chemical reaction principals (Fuel + Heat + Oxygen) and 3Ts (Time, Temperature, Turbulence), smoke is burnt in secondary combustion chamber with additional oxygen / air and thus recovering useful heat that escapes via stack hidden in unburnt fuel or white smoke.		

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During this inspection it was noted that Packaging's Central Boiler Company Pallet Burner (Pallet Burner) processes were emitting opacity in excess of emissions allowed by Rule 301 of the administrative rules promulgated under Act 451.

Enclosed are copies of the instantaneous and six-minute average readings taken at St. Clair Packaging, Inc.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 6, 2019 (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 the DEQ, AQD, Southeast Michigan District, at 27700 Donald Ct., Warren, Michigan 48092-2793 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Packaging 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 Packaging. 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,



Iranna Konanahalli  
Senior Environmental Engineer  
Air Quality Division  
586-753-3741 or Konanahalli@Michigan.Gov

cc: Ms. Mary Ann Dolehanty, DEQ  
Dr. Eduardo Olaguer, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Joyce Zhu, DEQ

**St. Clair Packaging, Inc. (N8239)**  
**2121 Busha Hwy.**  
**Marysville, Michigan 48040-1943**

**Telephone: (810) 364-4230**

Opacity readings on January 04, 2019

Central Boiler Company Pallet Burner wood stove

12:40 thru 12:43 pm over 85% opacity

<b>Time</b>	<b>Opacity Reading</b>		<b>Time</b>	<b>Opacity Reading</b>	
12:43:00	1	80	12:49:15	26	80
12:43:15	2	40	12:49:30	27	80
12:43:30	3	40	12:49:45	28	80
12:43:45	4	40	12:50:00	29	80
12:44:00	5	40	12:50:15	30	80
12:44:15	6	40	12:50:30	31	80
12:44:30	7	40	12:50:45	32	80
12:44:45	8	80	12:51:00	33	80
12:45:00	9	80	12:51:15	34	80
12:45:15	10	80	12:51:30	35	80
12:45:30	11	80	12:51:45	36	80
12:45:45	12	80	12:52:00	37	80
12:46:00	13	80	12:52:15	38	80
12:46:15	14	80	12:52:30	39	75
12:46:30	15	80	12:52:45	40	75
12:46:45	16	80	12:53:00	41	70
12:47:00	17	80	12:53:15	42	70
12:47:15	18	80	12:53:30	43	70
12:47:30	19	80	12:53:45	44	60
12:47:45	20	80	12:54:00	45	60
12:48:00	21	80	12:54:15	46	60
12:48:15	22	80	12:54:30	47	60
12:48:30	23	80	12:54:45	48	50
12:48:45	24	80	12:55:00	49	50
12:49:00	25	80	12:55:15	50	50
		70.4			71.6

80 Average 12:44:45 thru 12:52:15 PM

71 Average 12:43:00 thru 12:55:15 PM