



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GAYLORD FIELD OFFICE



C. HEIDI GREETHER
DIRECTOR

December 20, 2018

Mr. Tim Clark
Decorative Panels International
2900 Hill Avenue
Toledo, Ohio 43607

SRN: B1476, Alpena County

Dear Mr. Clark:

VIOLATION NOTICE

On December 18, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received an Air Emission Test Report for the November 1, 2018 stack test of Biofilter No. 1 at Decorative Panels International (DPI) located at 416 Ford Avenue, Alpena, Michigan. The purpose of the test report was to provide the emissions results for Biofilter No. 1, as required to demonstrate DPI'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 the conditions of the Renewable Operating Permit (ROP) number MI-ROP-B1476-2015a. This process is also subject to the federal National Emission Standards for Hazardous Air Pollution (NESHAP) for Plywood and Composite Wood Products, promulgated in 40 CFR Part 63, Subpart DDDD.

The results of the November 1, 2018 test report show:

Process Description	Rule/Permit Condition Violated	Comments
EUPRESS2S Biofilter No. 1	FGMACTDDDD Table, Emission Limit I.1. The limit requires Biofilter No. 1 to demonstrate compliance with one of six methods listed as part of the condition.	Biofilter No. 1 failed to demonstrate compliance with any of the six compliance options established in 40 CFR Part 63, Subpart DDDD, Table 1B, during testing on November 1, 2018. DPI chose to attempt demonstration of a minimum of 90% reduction of Formaldehyde, Methanol or Total Hydrocarbon (THC) as their compliance option. Test results show Biofilter No. 1 averaged a removal efficiency of 82% Formaldehyde, 50% Methanol and 84% THC over three runs. These removal efficiencies do not demonstrate compliance as required, and therefore constitutes a violation.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 11. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation 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, Cadillac District, Gaylord Field Office, at 2100 West M-32, Gaylord, Michigan 49735 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If DPI 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. 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,



Becky Radulski
Senior Environmental Engineer
Air Quality Division
989-217-0051

cc: Ms. Natalie Topinka, United States Environmental Protection Agency
Mr. Scott Ickes, Decorative Panels International
Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Shane Nixon, DEQ