



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GAYLORD FIELD OFFICE



DAN WYANT
DIRECTOR

June 24, 2014

Mr. Dennis Werblow
Director of Environmental Affairs
Decorative Panels International, Inc.
416 Ford Avenue
Alpena, MI 49707

SRN: B1476, Alpena County

Dear Mr. Werblow:

VIOLATION NOTICE

On April 11, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), observed a stack test on the Line 1 Biofilter Exhaust at Decorative Panels International located at 416 Ford Avenue, Alpena, Michigan. The purpose of this stack test was to determine Decorative Panels International'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 administrative rules, the conditions of Renewable Operating Permit (ROP) number MI-ROP-B1476-2009a, and Federal Maximum Available Control Technology (MACT) Standards, Subpart DDDD, 40 CFR 63.2240(b).

On May 27, 2014, the AQD received the results of this stack test. The results revealed the following:

Process Description	Rule/Permit Condition Violated	Comments
Press Line 1	Renewable Operating Permit (ROP) number MI-ROP-B1476-2009a, Table FGMACTDDDD, Condition I.1	Hazardous Air Pollutant emissions in excess of limits and/or Hazardous Air Pollutant destruction efficiency less than allowed standard

The stack test on April 11, 2014, measured total hydrocarbons, formaldehyde, and methanol at inlet and outlet of the biofilter. The MACT, Subpart DDDD, 40 CFR 63.2240(b), includes several emissions limits and destruction efficiency standards, compliance with any of which would indicate compliance with the standard. These are listed in the table below along with the reported results:

Emission Standard	Test Result
90% formaldehyde destruction	86.8%
Formaldehyde exhaust concentration no more than 1 ppmvd	4.9 ppmvd

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90% methanol destruction	60.9%
Methanol exhaust concentration no more than 1 ppmvd	22.1 ppmvd
90% total hydrocarbon destruction	80.1%
Total hydrocarbon exhaust concentration no more than 20 ppmvd	84.2 ppmvd

These results show a violation of ROP number MI-ROP-B1476-2009a and of the MACT, Subpart DDDD, 40 CFR 63.2240(b).

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 11, 2014 (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.

If Decorative Panels International 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 the stack test on April 11, 2014. 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,



William J. Rogers Jr.
Environmental Quality Analyst
Air Quality Division
989-705-3406

cc: U. S. Environmental Protection Agency, Region V
Ms. Janis Ransom, DEQ
cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ