



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GAYLORD FIELD OFFICE



DAN WYANT  
DIRECTOR

August 18, 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 August 1, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a Semiannual MACT Compliance Report from Decorative Panels International (DPI) located at 416 Ford Avenue, Alpena, Michigan. Review of this report revealed the following violations 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 MI-ROP-B1476-2009a, and 40 CFR Part 63, Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (PCWP MACT).

Process Description	Rule/Permit Condition Violated	Comments
FGMACTDDDD: Press Line 1	Table FGMACTDDDD, Condition III.2	Operating while Line 1 Biofilter was outside of its allowed temperature range
FGMACTDDDD: Press Line 1	Table FGMACTDDDD, Condition VII.2	Failure to report deviation for Press Line 1 after stack test revealed excess emissions
FGMACTDDD: Press Line 3	Table FGMACTDDDD, Condition VII.2	Failure to report deviation for Press Line 3 Biofilter after stack test revealed excess emissions
FGMACTDDD: Press Lines 1 and 3	Rule 910, R336.1910	Failure to operate Line 1 and Line 3 Biofilters in a satisfactory manner

Renewable Operating Permit MI-ROP-B1476-2009a, Table FGMACTDDDD, Condition III.2, reads as follows:

At any time a process controlled by either Biofilter is operating, the permittee shall maintain the 24-hour block Biofilter bed temperature within the range established according to 40 CFR 63.2262(m). **(40 CFR 63.2270)**

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In the Semiannual PCWP MACT Compliance Report received August 1, 2014, DPI reported that the Line 1 Biofilter operated at temperatures below its established operating range for between 21.6 hours and 24 hours per day for six days in January, 2014. DPI reported "temps remained low even though steam turned on. Suspected bypass valve malfunction."

Although the biofilter temperature could not be maintained within the established operating range, DPI chose to keep Press Line 1 operating. This is a violation of Renewable Operating Permit MI-ROP-B1476-2009a, Table FGMACTDDDD, Condition III.2, and of the PCWP MACT.

Renewable Operating Permit MI-ROP-B1476-2009a, Table FGMACTDDDD, Condition VII.2, reads as follows:

(The permittee is required to submit) Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD's District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))

On April 11, 2014, DPI conducted emissions tests on the exhaust from the Line 1 Biofilter. These tests indicated that the Line 1 Biofilter was not reducing air emissions from Press Line 1 to the levels required by the PCWP MACT. This is a deviation of the emission limits in the ROP and the PCWP MACT and also a deviation from proper operation.

On January 9, 2014, DPI conducted emissions tests on the exhaust from the Line 3 Biofilter. These tests indicated Press Line 3 with its associated biofilter was operating in compliance with the emissions levels required by the PCWP MACT. However, on May 29, 2013, DPI attempted to test the Line 3 Biofilter but stopped the test when it became apparent the exhaust would not meet the emission limits in the ROP and the PCWP MACT. From that time until submittal of the test results of the passed emissions test, Line 3 was legally considered to be operating in violation of these emission limits. This is also a deviation from proper operation.

These deviations should have been reported in the Semiannual MACT Compliance reports. They were not. The failures to report these deviations are violations of MI-ROP-B1476-2009a, Table FGMACTDDDD, Condition VII.2, and of Rule 213(3)(c)(i) of the Michigan Air Pollution Control Rules.

R 336.1910, Rule 910 of the Michigan Air Pollution Control Rules, reads as follows:

An air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.

Operating the Line 1 Biofilter below an acceptable operating temperature for six days and failure to investigate, determine, and correct the problem which was causing the Line 1 Biofilter to fall below its acceptable operating temperature are violations of Rule 910.

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Failure to perform maintenance or follow operating procedures which would have prevented the excess emissions discovered in the Press Line 1 and Press Line 3 emission tests is also a violation of Rule 910.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 8, 2014 (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 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 violations cited above. 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,



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

cc: Ms. Janis Ransom, DEQ  
cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ