



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GAYLORD FIELD OFFICE



C. HEIDI GRETHER
DIRECTOR

December 6, 2017

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

SRN: B1476, Alpena County

Dear Mr. Clark:

VIOLATION NOTICE

On November 14, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received an Air Emissions Engineering Test Report for the September 13, 2017 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 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 Renewable Operating Permit (ROP) number MI-ROP-B1476-2015. This process is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products. These standards are found in 40 CFR Part 63, Subpart DDDD.

The results of the November 14, 2017 test report show:

Process Description	Rule/Permit Condition Violated	Comments
EUPRESS2S Biofilter No. 1	FGMACTDDDD Table, Emission Limit I.1 Total HAP as defined in 40 CFR 63.2292. The limit requires Biofilter No. 1 to demonstration compliance with only one of six methods, as required in Table 1B of 40 CFR Part 63, Subpart DDDD.	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 September 13, 2017. 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 84% Formaldehyde, 43% Methanol and 79% 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 December 29, 2017. 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 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: Mr. Shane Nixon, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ