

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY





SRN: B8603, Kent County

March 29, 2019

CORRECTED

Mr. Max Jones Jeld-Wen Interior Door- Grand Rapids 4200 Roger B. Chaffee Memorial Boulevard. Grand Rapids, Michigan 49548

Dear Mr. Jones:

VIOLATION NOTICE

On March 26, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Jeld-Wen Interior Door- Grand Rapids (Jeld-Wen) located at 4200 Roger B. Chaffee Memorial Boulevard., Grand Rapids, Michigan. The purpose of this inspection was to determine Jeld-Wen'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; the conditions of Permit to Install (PTI) number 322-89; and to investigate a recent complaint which we received on March 26, 2019, regarding fugitive dust attributed to the baghouse operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Baghouses 1-3	PTI No. 322-89, Special Condition (SC) 15	Visible emissions observed.
Baghouses 1-3	PTI No. 322-89, SC 17 and Rule 910	Operating equipment while baghouses are not installed and operating properly.
Baghouses 1-3	PTI No. 322-89; SC 18 and Rule 370	Failure to properly dispose of collected air contaminants.

During this inspection it was noted that Baghouses 1-3 were emitting opacity in excess of emissions allowed by PTI No. 322-89, SC 15, which states that there shall be no visible emissions from this equipment. Dust was seen visibly flying around, and it was confirmed that Baghouse 1 has been vented externally since January due to holes in the bags.

Additionally, the AQD staff observed operation of the wood working equipment while baghouses 1-3 were malfunctioning. The baghouses and collection equipment are in various states of disrepair, including, but not limited to, large piles of sawdust from leaks in ductwork, blowholes on the sides of the ductwork, and poor seals in access doors. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law, and PTI No. 322-89, SC 17.

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Wood waste was observed, beyond the normal pre-spring-cleaning amount that was continuing to accumulate in various areas outside and near Baghouses 1-3 and the collection bins. This is a violation of PTI No. 322-89, SC 18 and Rule 370

Finally, pursuant to Rule 911(1), the AQD is hereby requesting that Jeld-Wen prepare and submit a Malfunction Abatement Plan and associated Preventative Maintenance Program. This Plan shall include Baghouses 1-3 and associated ductwork, and collection bins. This plan shall be submitted by May 27, 2019.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 19, 2019 (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.

Please submit the written response to the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Jeld-Wen 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 and for the cooperation that was extended to me during my inspection of Jeld-Wen. 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,

Senior Environmental Quality Analyst

Air Quality Division

616-558-1092

cc: Ms. Mary Ann Dolehanty, DEQ

Dr. Eduardo Olaguer, DEQ

Mr. Christopher Ethridge, DEQ

Ms. Jenine Camilleri, DEQ

Ms. Heidi Hollenbach, DEQ

Mr. Mike Worm, DEQ