



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

March 12, 2024

Danielle Hercules
Northwest Hardwoods, Inc.
657 76th Street SW
Byron Center, Michigan 49513

SRN: E4437, Kent County

Dear Danielle Hercules:

VIOLATION NOTICE

On February 7, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Northwest Hardwoods, Inc. located at 657 76th Street SW, Byron Center, Michigan. The purpose of this inspection was to determine Northwest Hardwoods, Inc.'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 Permit to Install (PTI) number 326-06D.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUGREENINSPECT	PTI No. 326-06D, General Condition No. 12 and Rule 370	Failure to properly collect and dispose of air contaminants.
EUGREENINSPECT	PTI No. 326-06D, Special Condition No. VI.2	Failure to maintain records of baghouse daily pressure drop reading.
EUPLANER	PTI No. 326-06D, Special Condition No. VI.2	Failure to maintain records of baghouse daily pressure drop reading.

During the compliance inspection conducted on February 7, 2024, the AQD staff observed that Northwest Hardwoods, Inc. was not properly collecting and disposing of saw dust from the scrap belt of the EUGREENINSPECT sawing operation. This constitutes a violation of Rule 370 for failure to properly collect and dispose of air contaminants in a manner so as to minimize the introduction of contaminants to the outer air.

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PTI No. 326-06D requires that the facility record at least once per calendar day (when operating) and keep, in a satisfactory manner, records of pressure drop across the bag filter portion of EUGREENINSPECT and EUPLANER. The records of pressure drop readings were inconsistent and unsatisfactorily maintained.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 2, 2024 (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 Laura Martin at EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 or MartinL30@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

It was discovered during the inspection that Northwest Hardwoods, Inc. had installed unpermitted equipment at this facility. Northwest Hardwoods, Inc. stated that the EUPLANER had been replaced with a new piece of equipment as of 2021. The AQD staff advised Northwest Hardwoods, Inc. on March 12, 2024, that this could be a violation of Rule 201 of the administrative rules promulgated under Act 451. The permit exemption identified by Northwest Hardwoods, Inc. does not apply to the replacement of process equipment and while a different exemption may apply, that requires additional documentation pursuant to Rule 278.

Be advised, Rule 201 of the administrative rules promulgated under Act 451 requires that an air use permit to install (PTI) be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

However, certain processes and process equipment may be exempt from obtaining a PTI. Rule 278 establishes requirements of eligibility for exemptions listed in Rules 280 through 291. To be eligible for a listed exemption, the owner or operator of an exempt process or exempt process equipment must be able to provide information demonstrating the applicability of the exemption. Pursuant to Rule 278(a), this demonstration should be provided within 30 days of a written request by the AQD and should include the following information:

- A description of the exempt process or process equipment, including the date of installation.
- The specific exemption being used by the process or process equipment.

- An analysis demonstrating that Rule 278 does not apply to the process or process equipment.

The AQD requests that Northwest Hardwoods, Inc. demonstrate either the new equipment is exempt from the requirements of Rule 201 or submit a PTI application for the subject processes at the facility.

The Michigan Air Pollution Control Rules can be accessed through the following website: www.michigan.gov/egle/about/organization/air-quality/laws-and-rules. Click on "State" to expand the selection options; then click on "Air Pollution Control Rules." Part 2 contains Rules 201 through 299. A digital copy of the Permit to Install Exemption Handbook can be found on the website at: www.michigan.gov/egle/about/organization/air-quality/laws-and-rules, under "State." Click on "State" to expand the selection options; then click on "Permit to Install Exemption Handbook (Part 2: Rules 278 to 291)." In addition, EGLE Environmental Assistance Center is available to answer questions at 1-800-662-9278.

During the inspection AQD staff discovered that the wet venturi scrubber associated with the wood-fired boiler was replaced with a like-kind in 2023. Stack testing has not been performed on the new control equipment since its installation. In order to confirm compliance with the emissions limits of the PTI, the AQD is requesting that stack testing be performed on EUBOILER1.

In accordance with Rule 1001 (R 336.2001) and General Condition 12 of General PTI No. 326-06D, the AQD is requesting that Northwest Hardwoods, Inc. conduct performance testing. The test protocol should be submitted 60 days prior to testing. The protocol shall include a proposed date for the testing, which is to be conducted no later than September 30, 2024. The test should determine the emission rate of PM, PM10, NOx, CO, Acetaldehyde, Acrolein, Arsenic, Benzene, and Formaldehyde. All testing must be conducted using United States Environmental Protection Agency approved test methods.

Not less than 7 days before the performance test is conducted, the AQD must be notified in writing of the time and place of the performance tests and who shall conduct them. Results of the performance test shall be submitted to the department in the format prescribed by the applicable reference test method within 60 days after the last date of the test.

The test plan should be submitted using the AQD's Air Quality Test Plan Submittal Form (arcgis.com). If you have any questions about the requested performance test, please contact me at the number listed below.

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Finally, pursuant to Rule 911, the AQD requests that Northwest Hardwoods, Inc. submit a Malfunction Abatement Plan (MAP) for the boiler and venturi scrubber, and all baghouses and associated process and collection systems at this facility.

Please submit the information regarding the MAP and the Rule 278 exemption demonstration within 30 days of the date of this letter to me at the address above.

If Northwest Hardwoods, Inc. 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 Northwest Hardwoods, Inc. 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,

Laura Martin

Laura Martin
Environmental Quality Analyst
Air Quality Division
616-280-0303

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE