



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

August 1, 2018

CERTIFIED MAIL – 7017 3380 0000 4105 8261
RETURN RECEIPT

Mr. Ron Steele
HMI Hardwoods of Michigan, Inc.
PO Box 620
Clinton, Michigan 49236

SRN: N0786, Lenawee County

Dear Mr. Steele:

VIOLATION NOTICE

On July 10, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of HMI Hardwoods of Michigan, Inc. (Company) located at 430 Division Street, Clinton, Michigan. The purpose of this inspection was to determine the Company'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) and the associated Air Pollution Control Rules and your Permit to Install (PTI) 460-85.

During the inspection, AQD staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---|--|--|
| 28 MM BTU/hour wood fired boiler controlled by multi-clone collector. | PTI 460-85, Condition # 16 and Rule 210. | Wood fired boiler carbon monoxide (CO) monitor readings suggests emissions exceed PTI emission limitations of 13.1 pounds per hour and 57.5 tons per year. In fact, annual CO emissions are calculated to be in excess of 100 tons triggering Major source requirements. |
| Wood fuel handling system. | PTI 460-85, Condition # 15 and Rule 370. | Improper handling of collected air contaminants resulting in opacity and accumulation of |

| | | |
|---|---------------------------|--|
| | | contaminants on the ground. |
| 28 MM BTU/hour wood fired boiler controlled by multi-clone collector. | PTI 460-85, Condition #28 | Wood fired boiler is started up using wood and diesel fuel instead of permit required natural gas. |

Furthermore, the Company is in violation of the U.S. EPA federally administered BOILER MACT regulatory program (40 CFR Part 63, Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources-Large Biomass category.) In particular, the requirement for an Energy Assessment and for boiler tune-ups required to be conducted on a biennial basis.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 22, 2018. 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 violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Furthermore, **verification of CO emission rates from the wood fired boiler is now required.** Within 180 days of the date of this letter, the permittee shall verify CO emission rates from the wood fired boiler by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A or in Part 10 of the Michigan Air Pollution Control Rules. The emission rate during testing shall be determined by the average of the acceptable test runs performed in accordance with the method requirements. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.

In addition, verification of opacity readings from the wood fired boiler is being requested. Please provide 30 days of continuous opacity monitor chart readings within 60 days of the date of this letter or an alternate compliance demonstration that verifies the wood fired boiler is complying with the 20% opacity limitation in the PTI.

Please submit written response to the DEQ, AQD Jackson District, at 301 East Louis B Glick Highway Jackson, Michigan 49201 and submit copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Company 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 this Company. 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,



Mike Kovalchick
Senior Environmental Engineer
Air Quality Division
517-416-5025

cc: Mr. Scott Miller, DEQ
cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Chris Ethridge, DEQ
Ms. Jenine Camilleri, DEQ