



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

April 10, 2020

Mr. John Gehringer  
Devereaux Sawmill, Inc.  
2872 North Hubbardston Road  
Pewamo, Michigan 48873

SRN: N2157, Ionia County

Dear Mr. Gehringer:

**VIOLATION NOTICE**

On March 5, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Devereaux Sawmill, Inc. located at 2872 Hubbardston Road, Pewamo, Michigan. The purpose of this inspection was to determine Devereaux Sawmill 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) numbers 1-09, 101-05, and 81-02.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Woodfired Boiler	PTI No. 81-02, EUBOILER1, Special Condition 1.1a	Exceedance of the Particulate Matter (PM) emission limit of 6.02 pounds per hour (pph).
Three (3) kilns	Rule 201	Failure to obtain a permit to install for the three (3) additional kilns that have been installed.

PTI No. 81-02 limits the emissions of Particulate Matter (PM) to 6.02 pounds per hour (pph). The records provided demonstrate that actual emissions of Particulate Matter (PM) from the woodfired boiler (EUBOILER1) were greater than 6.02 pounds per hour (pph) for a total of 47 days during the last 12-month rolling time period.

Additionally, during this inspection, it was noted that Devereaux Sawmill, Inc. had installed three (3) additional kilns at this facility. The AQD staff advised Devereaux Sawmill Inc. staff on April 3, 2020, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the three (3) kilns. An application form is available by request, or at the following website: [www.michigan.gov/air](http://www.michigan.gov/air) (in the shaded box on the upper right-hand side of the page).

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Be advised that Rule 201 requires that a permit 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.

In addition to the application for the permit to install for the three (3) kilns, please provide a facility-wide Potential to Emit (PTE) demonstration for PM10. Information on calculating PTE can be found at <http://www/michigan.gov/deqair>. Choose the "Permits" Tab, then "Air Permitting-Potential to Emit" under the Air Permitting Assistance Heading.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 1, 2020 (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 EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 495003 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Devereaux Sawmill, 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 Devereaux Sawmill, 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,



Kaitlyn DeVries  
Senior Environmental Quality Analyst  
Air Quality Division  
616-558-0552

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi Hollenbach, EGLE