



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

July 23, 2019

Mr. Dwaine Mellen
Superior Cedar Products
101 Fence Factory Road
P.O. Box 38
Carney, Michigan 49812

SRN: N5111, Menominee County

Dear Mr. Mellen:

VIOLATION NOTICE

On June 12, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Superior Cedar Products located at 101 Fence Factory Road, Carney, Michigan. The purpose of this inspection was to determine Superior Cedar Products 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.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
A surface coating line containing a dip container of low-VOC paint and a drying carousel with air fans. Emissions are released to the general in-plant environment.	R 336.1290 R 336.1201	The facility has not been maintaining records to show compliance with PTI exemption Rule 290.

During the inspection, Superior Cedar Products was unable to produce records to show compliance with R 336.1290. The requirement of R 336.1201 to obtain a permit to install does not apply if the conditions listed in subdivisions (b), (c), (d), and (e) of R 336.1290 are met.

The conditions of R 336.1290 require records of material use and calculations identifying the quality, nature, and quantity of air contaminant emissions to demonstrate that the emissions meet the emission limits outlined in the rule. The records are required to be maintained on file for the most recent 2-year period and are made available to the department upon request.

Based on Superior Cedar Products unable to meet the requirements of R 336.1290, the AQD staff advised Superior Cedar Products on June 12, 2019, 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 coating line process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

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.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 12, 2019 (which coincides with 21 calendar days from the date of this letter). 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.

Please submit the written response to EGLE, AQD, Marquette District Office, at 1504 West Washington Street, Marquette, Michigan 49855 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Superior Cedar Products 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 and for the cooperation that was extended to me during my inspection of Superior Cedar Products. 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,



Michael Conklin
Environmental Engineer
Air Quality Division
906-202-0013

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