

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



August 2, 2022

Matthew Henderson Nu-Wool Company, Inc. 2472 Port Sheldon Street Jenison, Michigan 49428

SRN: N7509, Ottawa County

Dear Matthew Henderson:

VIOLATION NOTICE

On June 22, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Nu-Wool Company, Inc. located at 2472 Port Sheldon Street, Jenison, Michigan. The purpose of this inspection was to determine Nu-Wool Company, 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 193-05.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Cellulose insulation manufacturing	Rule 910; PTI No. 193-05, Special Condition 1.3	Improper operation and maintenance of a control device.
	Rule 370; PTI No. 193-05, General Condition 12	Improper collection and disposal of an air contaminant.

AQD staff observed large amounts of particulate matter covering the entire surface area of the interior of the "Baghouse Room" and particulate exiting the ducting for baghouse 2 every time it pulsed. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451 and PTI number 193-05, Special Condition 1.3, 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.

In addition, the garage door and/or powered building vent is used to help ventilate the baghouse room. With the maintenance issues and amount of particulate covering the inside of the baghouse room, the operation of the power vent and opening of the garage door for ventilation allows the particulate to be introduced to the outer air.

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This constitutes a violation of Rule 370 of the administrative rules promulgated under Act 451 and PTI number 193-05, General Condition 12, which requires the collection and disposal of an air contaminant to be performed in a manner so as to minimize the introduction of contaminants to the outer air.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 23, 2022 (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 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Nu-Wool Company, 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 Nu-Wool Company, 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,

Chris Robinson Environmental Quality Analyst Air Quality Division 616-286-0083

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