



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

August 2, 2022

Matthew Henderson  
Cellulose Material Solutions LLC  
2472 Port Sheldon Street  
Jenison, Michigan 49428

SRN: N7756, 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 Cellulose Material Solutions LLC (CMS) located at 2472 Port Sheldon Street, Jenison, Michigan. The purpose of this inspection was to determine CMS'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 27-07.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Cellulose/fiber insulation manufacturing	PTI No. 27-07, Special Conditions 1.3a and 1.3b	Failure to implement requirements of the Preventative Maintenance Plan (PMP).
	PTI No. 27-07, Special Condition 1.5	Failure to provide records demonstrating compliance with SC 1.3a and 1.3b (PMP).
	Rule 910; PTI No. 27-07, Special Condition 1.4	Improper operation and maintenance of a control device.
	Rule 370; PTI No. 27-07, General Condition 12	Improper collection and disposal of a collected air contaminant.
	Rule 201	Failure to obtain a PTI prior to installation of Panel Line 2.

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During this inspection, the inspector was informed that daily pressure drop and uncertified visual emission observations were not being conducted which is a violation of the facility's Preventative Maintenance Plan requirements as specified in Special Condition 1.3a and 1.3b of PTI number 27-07. Also, since these observations were not being conducted, CMS was unable to produce associated records which is a violation of the recordkeeping requirements specified in Special Condition 1.5 of PTI number 27-07.

On June 22, 2022, AQD staff observed significant particulate matter (PM) accumulating on the ductwork and the equipment surrounding the Pneumafill baghouse. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451 and PTI number 27-07, Special Condition No. 1.4, 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.

The particulate observed on the Pneumafill baghouse ductwork and surrounding equipment as well as some that had blown outside constitutes a violation of Rule 370 of the administrative rules promulgated under Act 451 and PTI number 27-07, 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.

During this inspection, it was noted that CMS had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised CMS on July 18, 2022, 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 Panel Line 2 fiber insulation manufacturing process equipment. An application form is available by request, or at the following website: [www.michigan.gov/air](http://www.michigan.gov/air).

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 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.

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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 CMS 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 CMS. 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,

A handwritten signature in blue ink, appearing to read "Chris Robinson".

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

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