

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY SAGINAW BAY DISTRICT OFFICE



October 6, 2014

Mr. Skip Uber, General Manager Isabella Pellet 6900 West Baseline Road Lake Isabella, Michigan 48893

SRN: P0215, Isabella County

Dear Mr. Uber:

LETTER OF VIOLATION

On October 3, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of your facility located at 6900 West Baseline Road, Lake Isabella, Michigan. The purpose of the inspection was to determine compliance with the requirements of the federal Clean Air Act; as well as Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), and the conditions in air use permit 30-11A.

During the inspection, the following air pollution violations were identified:

Process Description	Violated	Comments
EU Dryer	PTI 30-11A III 1 & 2	An approvable Malfunction
		Abatement Plan was not
		submitted and the facility
		was operating.
EU Dryer	PTI 30-11A VI 2	Visible emissions records
		were incomplete.
FG Material	PTI 30-11A III 1 and IV 1	An approvable Malfunction
		Abatement Plan was not
		submitted and the facility
		was operating.
FG Material	PTI 30-11A VI 2	There is no audible alarm
		present for the baghouse
		pressure drop.

Rule/Permit Condition

It should be noted the facility is subject to the conditions of Consent Order 43-2014 which was effective as of September 16, 2014. The violations presented above may result in stipulated penalties for the facility.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 27, 2014. 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.

If Isabella Pellet 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 during my visit to your facility. If you have any questions regarding the violations or the actions necessary to bring your facility into compliance, please call me at the number listed below.

Sincerely,

Ben Rithopp

Ben Witkopp Environmental Engineer Air Quality Division Saginaw Bay District Office 989-894-6219

BAW:ai

cc: Ms. Lynn Fiedler, DEQ Ms. Mary Ann Dolehanty, DEQ Ms. Teresa Siedel, DEQ Mr. Thomas Hess, DEQ Mr. Chris Hare, DEQ Ms. Annette Switzer, DEQ