



Milwork Solutions by:

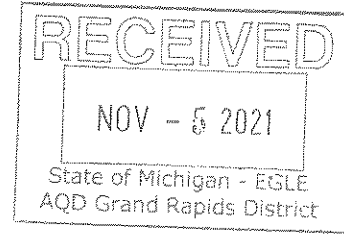
GM Wood Products

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November 1, 2021

Mr. Michael Cox, Environmental Quality Analyst
EGLE-AQD, Grand Rapids District Office
State Office Building
350 Ottawa NW, Unit 10
Grand Rapids, Michigan 49503-2341



Re: Violation Notice (SRN: P0477)
G-M Wood Products

Dear Mr. Cox,

This letter is in response to the violation notice (VN) written by you, dated September 30, 2021. The referenced VN, cited the company with failure to secure an air permit to install for coating operations located at G-M Wood Products' Newaygo, Michigan campus.

The G-M Wood Products facility, located at 531 Clay Street Newaygo, Michigan, is comprised of four (4) production plants (Plants 2, 3, 4, and 5) and a series of storage warehouses. The company manufactures, wood door casing and the operations consist of such wood working operations as routing, sawing, planing, drilling, and edge molding. All generated wood dust is collected by either one of four baghouse dust collectors, several localized bag collection collectors, and even a couple localized cyclone collectors followed by a bag collector. All post controlled air is released back into the general in-plant environment.

In addition, some of the assembly operations involve the use of both waterbased adhesives and hot melt adhesives form edges and joints. Molding and trim often receive a waterbased primer as they are coated either by a vacuum coating operation or one of few spray application stations. Any operation utilizing an atomizing sprayer is also equipped with an overspray collection filter, to prevent paint solids from leaving the building.

The installation of the various coating stations has occurred over the years, with our belief that they were exempt from air permitting. However, we recognize that we don't have documentation of the exemption(s) being employed or an understanding of the regulatory requirements to comply with such exemptions. Since your visit and with the assistance of our consultant Bruce Connell, Environmental Partners, we now have a better understanding of what was required to properly document the permit exemptions. While we have records of material allocations, they are based on quarterly distributions to each building and not monthly use records or emission calculations.

We believe that if we would have developed a proper monthly record keeping program, we would have been able to demonstrate compliance with the Rule 290 exemption. However, as of today, we are not able to make that monthly compliance demonstration. In addition, we believe that our future growth plans would not have allowed us to maintain the exemption too much further into the future.

Therefore, in an effort to address this VN and come into compliance, we are proposing that we submit an air permit application for our coating operations. This application will also address facility wide limitations on Hazardous Air Pollutants (HAPs), and particulate matter (PM) to restrict our potential-to-emit below major source thresholds. It is our intent to have an application submitted to the EGLE-AQD Permit Unit within 30 days of the date of this letter.

Should you have any questions, please feel free to contact me either by phone at 231-519-3831 or by e-mail at thuntley@gmcompanies.com.

Sincerely,
G-M Wood Products, Inc.
Tyler Huntley
Plant Manager

cc: Ms. Mary Ann Dolehanty, EGLE-AQD
Dr. Eduardo Olague, EGLE-AQD

Mr. Chris Ethridge, EGLE-AQD
Ms. Jenine Camilleri, EGLE-AQD

Ms. Heidi Hollenbach, EGLE-AQD