



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

May 11, 2021

Mr. Jim Osga, Environmental Manager  
Arauco North America  
5851 Arauco Road  
Grayling, Michigan 49738

SRN: P0699, Crawford County

Dear Mr. Osga:

**VIOLATION NOTICE**

On May 4, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received required reporting from Arauco North America located at 5851 Arauco Road, Grayling, Michigan. This reporting is required by Permit to Install (PTI) number 59-16G. A review of this reporting indicated the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUFORMING in FGBLNDFRM, BH11	Permit to Install 59-16G, Special Condition I.8, I.9, I.10	Testing result reported for PM, PM10, and PM2.5 was 1.09 pounds per hour, permitted limit is 1.05 pounds per hour.
EUFORMING in FGBLNDFRM, BH11	Permit to Install 59-16G, Special Condition I.7	Testing result reported for PM was 0.0025 gr/dscf, permitted limit is 0.002 gr/dscf.
FGDRYERRTO	Permit to Install 59-16G, Special Condition I.6	Testing result reported for PM 2.5 emissions was 16.70 pounds per hour, permitted limit is 16.55 pounds per hour.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 3, 2021 (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, Cadillac District, at 120 West Chapin Street, Cadillac, Michigan 49601 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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If Arauco North America 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. 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 black ink, appearing to read "Rob Dickman". The signature is fluid and cursive, with the first name "Rob" and last name "Dickman" clearly distinguishable.

Rob Dickman  
Senior Environmental Quality Analyst  
Air Quality Division  
231-878-4697 / DickmanR@Michigan.gov

cc: Ms. Tammi VanTil, Madison Consulting  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Shane Nixon, EGLE