



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

November 14, 2023

VIA EMAIL

Kyle Vogel  
HMI Hardwoods, LLC  
430 Division Street  
Clinton, MI 49236

SRN: N0786 HMI Hardwoods, LLC

County: Lenawee

**VIOLATION NOTICE**

Dear Kyle Vogel:

On October 10, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of HMI Hardwoods located at 430 Division Street, Clinton, Michigan. The purpose of this inspection was to determine HMI Hardwoods' 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 Permit to Install (PTI) 460-85.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
28 MM BTU/hour wood fired boiler controlled by multi-cone collector	PTI 460-85, Condition #16	Wood fired boiler carbon monoxide (CO) monitor readings suggest emissions exceed PTI emission limitations of 13.1 pounds per hour and 57.5 tons per year.
28 MM BTU/hour wood fired boiler controlled by multi-cone collector	PTI 460-85, Condition #14	Opacity records show multiple exceedances of 20% permit limit.
Wood fuel handling system	PTI 460-85, Condition #15	Improper handling of collected air contaminants resulting in accumulation of contaminants on ground around baghouses.

A previous Violation Notice issued August 1, 2018, detailed the above violations for CO readings and sawdust accumulation around the collection system. Opacity was not previously monitored before the 2018 Violation Notice was issued. This resulted in a stack test performed in 2019, which showed compliance with CO and opacity readings. This indicates that the emissions monitor and CO monitoring equipment are not reading correctly and require calibration and/or maintenance. Furthermore; HMI Hardwoods is in violation of the U.S. EPA federally administered BOILER MACT regulatory program (40 CFR Part 63, Subpart JJJJJJ –

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National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (Large Biomass category). In particular, the requirement for an Energy Assessment and for boiler tune-ups required to be conducted on a biennial basis.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 5, 2023, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation 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. Because the boiler is no longer being operated, the response for the cited CO, opacity, and MACT violations can be a commitment to perform actions necessary to correct them before beginning operations again. Resolution of the cited wood fuel handling system could be an update to your fugitive dust plan to include visual inspections for leaks and increased cleaning of the surrounding area.

Please submit the written response to Brian Merle at EGLE, AQD, Jackson District, at 301 E. Louis Glick Highway, Jackson, Michigan 49201 or MerleB2@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If HMI Hardwoods 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 HMI Hardwoods. 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,



Brian Merle  
Environmental Engineer  
Air Quality Division  
517-643-7357

cc: Annette Switzer, EGLE  
Chris Etheridge, EGLE  
Brad Myott, EGLE  
Chris Etheridge, EGLE  
Jeanine Camilleri, EGLE  
Scott Miller, EGLE