

## STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

## GRAND RAPIDS DISTRICT OFFICE



SRN: P0334, Ottawa County

July 12, 2024

Mark Schroeder Versatile Wood Solutions 11335 Apple Drive Nunica, Michigan 49448

Dear Mark Schroeder:

## VIOLATION NOTICE

On June 27, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Versatile Wood Solutions located at 11335 Apple Drive, Nunica, Michigan. The purpose of this inspection was to determine Versatile Wood Solutions' 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 to investigate a recent complaint which we received on June 24, 2024, regarding foul odors attributed to Versatile Wood Solutions' operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Spray Booths 1-3	Rule 201	Failure to obtain a Permit to Install (PTI).
Automatic Spray Line	Rule 201	Failure to obtain a PTI.
Sawdust generation controlled by a baghouse	Rule 201	Failure to obtain a PTI.
	Rule 370	Improper collection and disposal of an air contaminant.
	Rule 910	Improper operation and maintenance of a control device.

Four spray booths are being operated under a Rule 287(2)(c) air permitting exemption. Coating usage records are not being tracked in an appropriate manner to determine compliance with the monthly 200-gallon per emission unit coating limit. Operating this equipment without a PTI or proper permit exemption is a violation of Rule 201 of Michigan's Air Pollution Control Rules promulgated under Act 451.

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In addition, large amounts of sawdust/particulate matter (PM) were observed outside on the ground due to improper maintenance of the baghouse. This constitutes a violation of Rule 370 of Michigan's Air Pollution Control Rules 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. Improper operation of the baghouse constitutes a violation of Rule 910 of Michigan's Air Pollution Control Rules 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 equipment connected to the baghouse is being operated under Rule 201 permitting exemption Rule 285(2)(I)(vi)(C), which requires externally vented emissions to be controlled by an appropriately designed and operated fabric filter collector. The lack of proper operation of the baghouse does not allow the use of Rule 285(2)(I)(vi)(C), resulting in a Rule 201 violation.

A program for compliance may include a completed PTI application for the spray booths and adhesive application and sawdust-generating process equipment. An application form is available by request, or at the following website: 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 2, 2024 (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 Chris Robinson at EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 or RobinsonC17@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Versatile Wood Solutions 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Versatile Wood Solutions. 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,

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

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