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December 13, 2019

Ms. Becky Radulski  
Environmental Engineer  
Michigan EGLE Air Quality Division  
2100 West M-32  
Gaylord, Michigan 49735

Re: Violation Notice dated November 20, 2019  
Decorative Panels International Inc. – Alpena Hardboard Mill

Dear Ms. Radulski:

We are responding to the Violation Notice (“VN”) dated November 20, 2019, issued to Decorative Panels International (“DPI”) by the Michigan Department of Environment, Great Lakes, and Energy (“EGLE”). The VN states that EGLE observed alleged violations of Rule 901, and conditions of the Renewable Operating Permit (ROP) number MI-ROP-B1476-2015a.

The VN states the alleged violation occurred on October 9, 2019 following a complaint received on that same day. An additional complaint was received and subsequently investigated on November 25, 2019 and was reported to DPI both verbally and electronically on November 27, 2019. As requested by the VN, this written response addresses each alleged violation, explains possible causes, provides a summary of the actions that have been taken by DPI, and identifies steps being taken to prevent a reoccurrence.

**Process Description: FGMACTDDDD**

**Rule/Permit Condition Violated: Rule 901**

**Alleged Violation/Comment: Unreasonable odors from hardboard manufacturing process**

We have investigated operations of the hardboard manufacturing operations on the dates defined in the VN and in the subsequent email to determine if some type of upset or malfunction had occurred to cause the odors detected off-site. Our investigations indicated that all process sources and associated emission control equipment were operating in compliance with all AQD-approved Preventive Maintenance/Malfunction Abatement Plans (“PM/MA”) Plans. DPI conducts periodic inspections of the media beds in the biofilters and associated ducting for the units, and no anomalous conditions have been identified during these inspections. Consequently, we are unable to explain the cause for the various odors detected by you at off-site locations and undertake actions “necessary” to correct the alleged violations.

Additionally, on October 9, 2019, we were conducting required sorbent tube testing for biofilter #3 and both DPI staff and staff from the testing firm, Apex, were on the roof at that time. No odors were detected at that time, no non-typical visible emissions were noted, and the results from the sorbent tube test for that day showed compliance.

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Since the Alpena Mill first began operation in the 1950s, odors have been generated by the hardboard manufacturing processes. During the period from 1994 through 1995, the former owner of the Alpena Mill (ABTco) conducted extensive analyses of the process sources responsible for generating odors, the types of odors, the factors influencing dispersion of odors in the surrounding community. This analyses included available process changes and control devices to substantially reduce odors from the Alpena operations. Under strict AQD oversight and in accordance with a Consent Judgment entered with the Alpena Circuit Court, ABTco and its consultants completed a scientific and objective approach to characterize the odor “profile” of the Alpena Mill.

Historically we have not seen reference to an odor characterized as “burnt sweet wood” described in the Activity Report. DPI cannot attribute the “burnt sweet wood” odor to any particular source at the Alpena Mill. Odors from the presses have been consistently described as “burnt wood” while odors from the cooker tower are described as “sweet wood”.

Unfortunately, EGLE did not contact me or any other Alpena personnel at the time of the odor surveillance activities, even though the survey took place during normal office hours in the immediate neighborhood of the plant and included the entrance to the Mill. Had this been done, we could have investigated whether any process or other source at the Alpena Mill was generating a “burnt sweet wood” odor on that date and time and had real time information on the operations of the process equipment as well as the control equipment. Being notified over a month later makes it very difficult to conduct a thorough and detailed investigation into the allegation.

In summary, DPI questions whether the odors detected on either October 9, 2019 or November 25, 2019 constituted odors of sufficient frequency, intensity and duration that caused an unreasonable interference with any Alpena resident’s enjoyment of life and property such that a violation of Rule 901 occurred. However, DPI has no desire for escalated enforcement and will continue working cooperatively with AQD officials to address questions or concerns regarding odors from the Alpena Mill.

Sincerely,



Scott Ickes  
Senior Manager, Compliance  
Decorative Panels International, Inc.

cc: Ms. Jenine Camilleri, EGLE