



An American Standard Brands Company

August 23, 2022

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

Re: Response to Violation Notice dated August 9, 2022
Decorative Panels International Inc. – Alpena Hardboard Mill

Dear Ms. Radulski:

We are responding to the Violation Notice (“VN”) dated August 9, 2022, issued to Decorative Panels International (“DPI” or “the Company”) by the Michigan Department of Environment, Great Lakes, and Energy (“EGLE”). The VN alleges violations of Rule 901 occurring on August 5, 2022. Addressing the issues outlined in the VN is the Company’s top priority and for this reason DPI has retained odor expert, Suresh Relwani, at RK Associates, Inc., to help investigate potential odors and their sources. Although DPI’s investigation is ongoing, the response below outlines steps already taken to address potential odor issues related to DPI’s wastewater lagoon. DPI proposes to provide a supplemental response as to both alleged odors after consultation with Mr. Relwani, among others, and the Company can provide an update to EGLE by September 7, 2022. You will of course continue to have DPI’s full cooperation in the meantime.

Process Description:	“Lagoon Odor”
Alleged Rule/Permit Condition Violated:	“Rule 336.1901(b)”
Alleged Violation/Comment:	“On August 5, 2022, AQD staff followed up on a series of complaints that received concerning foul sewer and hot rotting cooked cabbage odors coming from this facility and were able to verify that these odors were a violation of Rule 901(b).”

Response: As indicated above, DPI continues to investigate the source of the alleged complaints with help of its expert. One potential source of confusion from the VN is the potential difference between “sewer” odor complaints and “rotting cabbage” odor complaints as they appear to be different odors. Based on the Company’s understanding, EGLE visited the facility several times to investigate sewer odors and found none but on a fourth or fifth visit discovered the “rotting cabbage” odor, which was expressly distinguished from the initial odor complaints.

Although the Company's investigation is ongoing, the facility has already taken the following steps to potentially address wastewater lagoon operations. The Company observed warmer than usual water temperatures in the process wastewater which may have limited Dissolved Oxygen (DO) solubility. To encourage aerobic respiration, the facility has taken the following steps:

- On August 7, 2022, DPI began adding approximately 200-250 gallons per minute of river water to the lagoon to decrease the lagoon temperature and increase aerobic respiration.
- On August 8, 2022, an additional aerator was brought online.
- On August 9, 2022, two additional aerators were brought online and approximately 2-3 million gallons per day of were recycled through a rented pump in an effort to recirculate and re-aerate existing lagoon water. Not counting the rented pump, aeration had been increased to 1,575 horsepower (hp) compared to our usual target summer operating level of 1,200 hp.
- Increased coverage in aeration, enhanced by precipitation and cooler temperatures, significantly increased Dissolved Oxygen levels in the lagoon and DPI has not received any lagoon odor complaints subsequent to Sunday, August 7, 2022.

DPI expects that steps taken above, along with cooler seasonable temperatures will mitigate the potential for any wastewater lagoon odors in the near term. Additionally, to the extent that DPI's expert investigation yields recommendations to further prevent potential lagoon odors in the future, the Company will closely evaluate any such recommendations for implementation.

Process Description:	"Sweet woody odor, burnt wood odor"
Alleged Rule/Permit Condition Violated:	"Rule 336.1901(b)"
Alleged Violation/Comment:	"On August 5, 2022, AQD staff followed up on complaints of sweet burnt wood odors coming from this facility and were able to verify that these odors were a violation of Rule 901(b)."

Although DPI's investigation continues, an initial Company review of monitoring logs for hardboard manufacturing operations and air pollution control units on August 5th did not reveal any upset conditions or malfunctions on our process lines that would explain the alleged "sweet burnt wood" odors observed off-site on August 5. While DPI is not suggesting that an odor was not detected, it is difficult to ascertain the source of this odor at our facility based on the description, especially in concurrence with the reported "stale rotting vegetation" odor. As indicated above, DPI's odor expert is helping the Company to evaluate this potential odor complaint from August 5, potential sources, and any potential mitigation recommendations.

DPI is treating this issue with the utmost seriousness. The Company's internal response team is meeting every day to address these issues and has already implemented swift corrective actions to lower the temperature of our wastewater lagoon and facilitate aerobic conditions, which we believe has eliminated odor issues with the lagoon in the short-term. Additionally,

DPI has retained a respected odor expert to help identify sources and additional potential corrective actions. As the Company is determined to understand these issues better, we respectfully request that EGLE provide copies of the underlying citizen complaints and EGLE materials used to develop the VN, so as to aid our expert to further investigate these issues. We have made FOIA requests in parallel.

DPI submits this information under a full reservation of its rights, claims, and defenses. DPI is providing this submission as a response to amicably resolve alleged violations; however, it should not be deemed as an admission of liability. Although DPI is taking all care and devoting significant resources to responding to the VN and related complaints, the Company respectfully denies that any ongoing nuisance level odors are being created by DPI's operations at this juncture.

Please feel free to contact me with any questions.

Sincerely,

Decorative Panels International, Inc.



Timothy D. Rombach, PE
Sr. Environmental Engineer

Copy: Dan VanMassenhove, DPI
Tammi Van Til, Madison Consulting
Jenine Camilleri, EGLE
Shane Nixon, EGLE
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