



An American Standard Brands Company

September 29, 2022

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

Re: 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 and Second Violation Notice (VN2) dated September 15, 2022 issued to Decorative Panels International (“DPI” or “the Company”) by the Michigan Department of Environment, Great Lakes, and Energy (“EGLE”). The VNs state that EGLE observed alleged violations of Rule 901 and the Company’s response did not ...“identify an acceptable corrective action plan to resolve the cited violations and to avoid future odor issues.”

The VN states the alleged violations occurred on August 5, 2022 for the Rule 901 complaints. As requested by the VN, this written response addresses the dates of the alleged violations, explains possible causes and durations, explains whether the alleged violations are ongoing, provides a summary of the corrective actions that have been taken and are being taken by DPI, and identifies steps being taken to prevent a reoccurrence of the alleged circumstances.

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).”

DPI submits this correspondence to summarize information provided in the responses to the August 5, 2022 VN and clarify additional information as requested in the VN2:

Possible Causes and Durations

DPI presumes the anaerobic off-gas condition identified at the lagoon was the result of an upset condition, namely, the lack of available dissolved oxygen. The condition was identified by EGLE on the afternoon of August 5, 2022 and appears to have been mitigated by August 8, 2022. The condition may have been related to consecutive days with low dissolved oxygen (i.e., less 0.4 mg/L) and an elevated ambient temperature (e.g. above 80 degrees F).

Whether the Alleged Violations are Ongoing

The alleged violation has been corrected and is not on-going. Based on the lack of odor complaints and increased dissolved oxygen concentration subsequent to August 8, 2022 resulting from the addition of fresh water to the lagoon and additional corrective measures described in our correspondence submitted on August 29, 2022 (which we incorporate by reference), the condition appears to have been remedied.

Provide a Summary of the Corrective Actions Taken and Being Taken by DPI

Additional corrective action measures since our last correspondence include receiving more spare parts to include aerator stock equipment and materials (currently in-stock at the facility):

- 500 ft of 1/0 submersible wire (floating and pontoon aerators)
- 250 ft of 4/0 submersible wire (platform aerators)

and vendor agreement

in cases of aerator malfunction that include:

- Bearing repair or replacement turnaround within 2 days
- Motor winding turnaround within 2 weeks

The vendor and stock material agreements (enough for approximately 5 floating aerators and 1 platform aerator) are in place and provide DPI the capability to repair or replace equipment that was previously delayed through supply-chain difficulties. Capital expenditure prior to the beginning of next summer includes the purchase and receipt of two complete floating aerators, one platform gearbox, and miscellaneous stock items for repair to limit the condition of having more than two aerators down for more than two weeks.

Identify Steps Being Taken to Prevent a Reoccurrence of This Alleged Circumstance

As an interim measure, if lagoon target operating conditions exhibit a dissolved oxygen concentration of less than 0.4 mg/L at the lagoon inlet and lagoon outlet for three consecutive days during ambient temperatures greater than 80 degrees F, additional aeration will be energized above the existing operating horsepower (at 75 hp intervals or greater). Based on historic operations, DPI believes this corrective action will prevent a reoccurrence of the alleged circumstance; however, DPI reserves the right to alter or change these actions if further review of the data identifies a better abatement method with EGLE approval. Additionally, the capital expenditure will allow for routine maintenance and repair during certain unforeseen issues such as supply-chain delays, which may have exacerbated delays to obtain additional equipment.

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).”

Possible Causes and Durations

In late August DPI identified an upset condition with the No. 3 Biofilter media. Specifically, the biofilter was unexpectedly operating below presumed optimal bed moisture percentages. On July 1, 2022 DPI had completed a regularly scheduled change-out of the media, which occurs approximately every two years due to the quick rate of decay in light of the extensive time and labor it takes to schedule and implement a media replacement event.

Despite normal start-up procedures that included seeding the media with approximately 1,600 gallons of lagoon water per bed (64,000 gallons of lagoon seed-water total), DPI discovered the media was drying, which can create preferential airflow pathways and inhibit microbial activity within the beds. Repeated attempts to water the beds with fire hoses only increased moisture in the beds temporarily.

Prior to the media change-out, Biofilter No. 3 had been operating at 97% efficiency. Bed watering had not been required for any reason, as bed watering had also not been required for the No. 1 Biofilter media replacement and operation since the previous summer during high daily temperatures. As indicated in previous correspondence, review of targeted operating levels within the AQD-approved Preventive Maintenance/Malfunction Abatement Plan (“PM/MAPs”) logs did not identify any clear indicators that the humidification system was abnormal. The humidification system requirement for operation identified a target level of 200 gallons per minute (gpm) for recirculated water and our logs recorded amounts around 260 gpm. The Company had no reason to suspect the humidification system as high ambient temperatures were presumed to be compromising the normal start-up post-media change.

Provide a Summary of the Corrective Actions Taken and Being Taken by DPI

The bed watering system on the No. 3 Biofilter had not been utilized for at least two years (it was not needed since it was utilized primarily only for bed-cooling during high operating temperatures) and several iterations of repair were required. Repeated watering attempts, utilizing fire hoses and supplementing with the watering system, did not maintain targeted moisture levels even after DPI determined the entirety of the bed watering system was functioning properly.

Inspection of the humidification system identified that several spray nozzles had become clogged and the system could not maintain targeted moisture levels. Upon discovery of this issue and receipt of odor complaints that could have been attributed to this source, DPI shut down the No. 3 Press Line, manufacturing was ceased, and the humidification system sprays were inspected, cleaned and restored, resulting in a humidifier recirculation rate increase that was over 300 gpm. Although DPI believes these corrective actions have resolved the issue.

Whether the Alleged Violations are Ongoing

Once the humidification system had been restored to higher flows, increasing moisture levels, DPI expects potential short circuiting issues have been corrected. DPI utilized APEX Companies to conduct quarterly carbon sorbent tube testing on September 14, 2022 which resulted in passing test per our MAP. To the extent that Biofilter No. 3 may have contributed to elevated wood odor levels identified on

August 5, 2022, based on the results of the quarterly compliance testing, DPI does believe the condition is resolved.

Identify Steps Being Taken to Prevent a Reoccurrence of This Alleged Circumstance

DPI will revise the startup procedures for No. 3 Biofilter to include a minimum humidifier flow revised from 200 gpm to 300 gpm for startup activities post media change-out and include annual inspection/maintenance of the humidifier sprays in our routine maintenance program. MAP revisions will be submitted under separate cover for AQD approval within the next two weeks.

The corrective actions DPI has taken to remedy these upset conditions is consistent with preliminary input from our odor expert at RK & Associates. Although we expect the corrective measures taken, along with additional preventive maintenance activities proposed should prevent potential reoccurrence of these issues, we will continue to work with RK & Associates to determine whether reasonable additional measures would be helpful.

Closing

Thank you for your consideration of our above response and related measures, and we will keep you informed as to the status of our activities as needed. If you have any questions regarding any of the above, please don't hesitate to contact me. The Company is proceeding in good faith to amicably resolve these issues, however these subsequent remedial measure should not be construed as an admission of a violation.

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
Charlie Denton/Joel Bowers, Barnes & Thornburg LLP