



An American Standard Brands Company

November 23, 2022

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

Re: Violation Notice dated November 2, 2022
Decorative Panels International Inc. – Alpena Hardboard Mill

Dear Ms. Radulski:

We are responding to the Violation Notice (“VN”) dated November 2, 2022 issued to Decorative Panels International (“DPI” or “the Company”) by the Michigan Department of Environment, Great Lakes, and Energy (“EGLE”).

The VN states the alleged violations occurred on October 31, 2022 in relation to Rule 901. 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 by DPI, and identifies steps being taken to prevent a reoccurrence of the alleged circumstances.

Process Description: “Sweet woody odor, burnt wood odor”

Alleged Rule/Permit Condition Violated: “Rule 336.1901(b)”

Alleged Violation/Comment: “On October 31, 2022, AQD staff followed up on complaints of wood odors coming from this facility and were able to verify that these burnt woody odors with a component of sweet woody odors were a violation of Rule 901(b).”

Possible Causes and Durations

On October 31, 2022, EGLE inspector, Becky Radulski met with me to discuss odors described above on her visit to Alpena. My meeting with Ms. Radulski was from approximately 12:15 to 12:40 pm, after which I began my investigation of potential sources. Upon inspection of the Biofilter No. 1 it was observed that the poppet valves used to control airflow to the biofilter (up-flow or down-flow) were not seated correctly allowing a potential 1 inch gap that might have been the source of odors observed. As soon as this poppet valve issue was discovered, the No. 1 line was shut down and remained down until about 4:40 pm when the line was restarted after the biofilter poppet valves had been resealed with the help of a subcontractor.

Based on the Company's subsequent investigation, the following series of events explain the unexpected "mis-seating" of the poppet valves. On Saturday October 29, the No. 1 line was down most of the day to address a production issue. When operators went to restart the line at about 6:30 pm that day, it was discovered that the poppet valves were in "by-pass mode". Because the line cannot operate in "by-pass mode" (a control used to prevent bypass of the biofilter), operators switched the poppet valves from the control panel to "up flow mode" which in the ordinary course would cycle the poppet valves to ensure proper biofilter operation. In switching to "up-flow mode" (the valves are controlled pneumatically), and apparently the valves did not seat correctly (allowing for small gap).

As for the reason the poppet valves had been positioned in "by pass mode" in the first place, further investigation revealed that during the down-time on October 29, steam to biofilter No. 1 had not been shut-off, and based on process logic built into the control panel, the system automatically switched to by-pass mode when the biofilter reached 98 degrees F (all this occurring while the No. 1 press was shutdown, therefore not resulting in any actual emissions "by pass" of the biofilter). This automatic process logic was not previously known to Company personnel and has since been disabled to prevent further occurrence.

In terms of possible duration of the alleged violation, Line No. 1 only operated with the mis-seated poppet valves for 1.5 hours on October 29 (from approximately 6:30 to 8:00 pm); 3 hours, 20 minutes on October 30 (from about 4:40 to 8:00 am when Line 1 was only running at 50 percent capacity), and about 12 hours on October 31 (from 12:00 am until 6:00 am, then 8:00 am until about 2:00 pm when the issue was discovered and the Line shutdown).

Reviewing meteorological data from the "Northside Station" for the period of October 29 through October 31, winds were only on-shore (mainly south easterly) during this period from late morning into the evening hours. As a result, the limited running time of Line No. 1 on October 29 and October 30 didn't likely coincide with on-shore winds, although on-shore winds would have coincided with Line 1 operations on October 31 from about noon until 2:00 pm when the issue was discovered and Line No. 1 was shutdown to address the issue. In total, it appears there were only a few hours of Line No. 1 operation on October 31 (during this poppet issue) that coincide with on-shore winds that might have caused detectable odors.

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

As indicated above, Line No. 1 was immediately shut down as soon as the mis-seated poppet valves on the No. 1 biofilter were discovered. The circumstances leading to the mis-seated poppet valves had not happened before (as the automatic cycling of the valves due to control panel process logic was unknown to the facility personnel until investigated later on October 31). In sum, the situation that lead to the mis-seated poppet valve was unforeseen to the Company. Additionally, DPI has taken steps outlined below to prevent this circumstance from happening in the future.

Whether the Alleged Violations are Ongoing

Because the No. 1 Line was shut down upon discovery of the issue and the poppet valves were properly seated before restart, this issue is not "ongoing" and has been corrected.

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

DPI has taken the following steps to prevent reoccurrence of this poppet valve issue. First, the automatic control panel process logic that cycles the poppet valves in high temperature situations has

been disabled. Additionally, the Company has taken steps that prevent cycling of the poppet valves from the control panel altogether. Based on these changes, the poppet valves on Biofilter No. 1 can now only be cycled manually at the valves, which will completely avoid future situations where the line is operating with improperly seated poppet valves.

Closing

Thank you for your consideration of our above response and related measures. Additionally, we would like to thank you for contacting us on the same day you investigated the issue. Your communication of the issue in "real-time" better helps the Company potentially locate and correct issues. If you have any questions regarding any of the above, please don't hesitate to contact me. As indicated in previous correspondence, the Company is proceeding in good faith to amicably resolve these issues, however DPI's subsequent remedial measure should not be construed as an admission of any violation.

Sincerely,

Decorative Panels International, Inc.



Timothy D. Rombach, PE
Sr. Environmental Engineer

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