

Memo:

To: Monica Brothers
From: Rush Burpee
Date: August 31, 2017
C.C.: Bob Trayers, Nate Quick, Mike Fick
Re: Landscape Forms Responses to DEQ

Monica,

Following are Landscape Forms responses to the violation notice issued August 14th, 2017 in regards to the Woodshop dust collection system baghouse at Landscape Forms, Inc. E. Michigan facility. These responses and action plans were provided by Bob Trayers, our Industrial Maintenance Leader.

“After the DEQ visit and following e-mail on June 15, 2017, an investigation was performed regarding the wood collection system and your concerns, and at this time the unit itself continues to operate effectively”.

Observed wood particulate on roof of building and coming out of the baghouse itself. Unit is not being operated and maintained appropriately. (R 336.1910 (Rule 910)).

- The excess wood particulate was the result of a rotary valve blockage a week earlier when the system clogged. Landscape Forms technicians disassembled the rotary valve to clear the blockage, which resulted in a fair amount of wood dust on and around the dust collection unit, which was not completely disposed of. This contributed to the excess amount of wood dust observed on the east side of the unit. We also discovered a small leak in the rotary valve at this time.

Baghouse not being appropriately operated and this the Rule 285 exemption from permitting cannot be used. Because the exemption has been violated and the wood shop processes do not operate under a PTI, this is also a violation of Rule 201. (R 336.1285 (l)(vi) (C) (Rule 285 and R 336.1201 (Rule 201))).

- Repair is set to be completed by September 5, 2017 to re-seal the rotary valve to address any minor leakages.
- Additionally a weekly PM has been put in place to inspect the wood dust collection system unit which includes the following tasks:

- Inspecting entire wood collection baghouse unit, including rotary valve, ducting, door seals and bearing seals for leaks and repair or replace as needed.
- Inspect filters, chain drive sprockets, drive gear belt and chain for wear, repair or replace as needed.

Landscape Forms is currently in the process of purchasing new dust collection equipment and moving the entire Woodshop processes to our Midlink, East Cork location. The schedule for having this new equipment operational and the old equipment at E. Michigan terminated is around November 1, 2017. To the best of our knowledge, this new self-contained equipment under normal operations is not a source of an air contaminant and will meet the criteria for Rule 285 exemption for having to apply for a permit to install.

Please let me know as soon as possible if the above mentioned exemption is not correct.

Thank you,

Rush Burpee
Manufacturing Engineer
Landscape Forms, Inc.