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April 16, 2024

EGLE, AQD, Marquette District Office
Drew Yesmunt
1504 West Washington Street
Marquette, MI 49855

Re: Violation Notice – April 1, 2024

Dear Mr. Yesmunt,

PotlatchDeltic Land & Lumber, LLC. (PotlatchDeltic) received a Violation Notice dated April 1, 2024, notifying the site that Boiler No. 2 (EU-WOODBOILER2) at the company's wood product mill in Gwinn, Michigan was out of compliance with Michigan Air Pollution Control Rule 331(1)(c) and conditions of the mill's Renewable Operating Permit (MI-ROP-N5940-2019a) and Permit to Install (PTI No. 145-23). The Violation Notice requests that PotlatchDeltic initiate actions to correct the alleged violation and submit a written response by April 22, 2024. As requested by the Violation Notice, this letter response provides the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

On January 16-17, 2024, emissions testing was conducted, and on January 26, 2024, preliminary results indicated potential exceedances of particulate matter emissions limits for EU-WOODBOILER2. In response, the boiler was promptly shut down within 24 hours of receiving the preliminary results. Subsequent inspection revealed a hole in the multiclone, the pollution control equipment of the boiler, which was believed to be the root cause of the exceedance. Following completion of the corrective actions outlined below, the boiler was retested on February 27, 2024, demonstrating compliance with MI-ROP-N5940-2019a EU-WOODBOILER2 particulate emission limits. *(a copy of the February 27, 2024, results is attached.)*

As of the latest test conducted on February 27, 2024, EU-WOODBOILER2 demonstrated compliance with the particulate matter emission limits, indicating that the violation is not ongoing. The timely response following the initial report of a potential exceedance included shutting down the boiler, identifying and repairing the issue with the multiclone, and conducting maintenance, effectively resolved the violation.

The following corrective actions were taken:



1. **January 26, 2024:** Prompt shutdown of EU-WOODBOILER2 within 24 hours of receiving preliminary results indicating potential exceedances of particulate matter emissions limits. Inspection and troubleshooting began.
2. **February 4, 2024:** Replacement of the impaired multiclone tube and swirl vane, addressing the identified hole in the multiclone.
3. **February 4 – 11, 2024:** Additional maintenance and inspections completed on the boiler.
4. **February 11, 2024:** EU-WOODBOILER2 was brought back online and tuned after corrective measures were implemented.

These actions, undertaken promptly, effectively addressed the violation and ensured compliance with the emissions limits.

Several proactive steps are being taken to prevent a reoccurrence of similar multiclone issues. One key measure is the implementation of a replacement schedule for the multiclones, with replacements scheduled for every four years or earlier as needed. Previously, the schedule relied on an as-needed basis, but we have transitioned to a structured approach to enhance proactive maintenance practices. The new schedule has been thoroughly documented in the facility's Preventative Maintenance program and will also be incorporated into the facility's Malfunction Abatement Plan. By establishing a structured replacement schedule and integrating it into existing maintenance and abatement plans, we aim to ensure ongoing compliance with emissions limits and minimize the risk of future violations.

If you have any additional questions, don't hesitate to get in touch with me.

Sincerely,

A handwritten signature in black ink, appearing to read "JP", written over a white background.

James Pearson
Mill Manager

Enclosure

CC: M. Tyler, PotlatchDeltic
A. Craner, PotlatchDeltic
T. Mosher, PotlatchDeltic
J. Camilleri, EGLE