



April 19, 2019

Ms. April Lazzaro
Michigan Department of Environmental Quality
Air Quality Division, Grand Rapids District
350 Ottawa Avenue NW, Unit 10
Grand Rapids, Michigan 49503



RE: JELD-WEN Interior Door – Grand Rapids
SRN B8603, Kent County
Violation Notice Response

Ms. Lazzaro:

This letter is provided in response to the Michigan Department of Environmental Quality (DEQ), Air Quality Division's (AQD) inspection of the above referenced facility on March 26, 2019 and subsequent Violation Notice issued on March 29, 2019.

The items identified by DEQ, AQD are addressed below.

Baghouses 1-3 – Visible emissions observed

- Prior to the inspection on March 26, 2019, the facility contracted with a vendor and scheduled the replacement of the filter bags in Baghouse #1 for March 30 and 31, 2019. The filter bag replacement was successfully completed on March 31, 2019.
- Magnehelic readings of Baghouse #3 are in the upper ranges of acceptable limits, therefore as a proactive measure, the facility obtained quotes for filter bag replacement on this system. The facility is evaluating the quotes and will continue to proactively monitor the magnehelic readings and baghouse operations while the filter bag replacement work is being scheduled.
- The exterior ductwork and equipment on all three baghouse systems were thoroughly inspected on March 27, 2019 and necessary repairs were completed by March 31, 2019. Repairs to the system included:
 - Repair of seals found in ductwork on Baghouse systems 1-3
 - Replacement of the sweep arm on Baghouse #1
 - Repair of the hatch door on Baghouse #3
 - Repair of the man door on Baghouse #3
 - Repair of the inspection hatch on the return line from the waste containers
 - Repair of the transfer fan
 - Repair of the transfer valve
- On April 12, 2019, caps were fabricated and installed on the exhaust ports that connect to the waste containers to prevent potential residual dust from escaping during container exchanges.



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Baghouses 1-3 – Operating equipment while baghouses are not installed and operating properly

- As stated above, a thorough inspection of the exterior ductwork of Baghouses 1-3 was conducted and repairs made to ensure the baghouse system was operating properly.
- A Malfunction Abatement Plan and associated Preventative Maintenance Program for the baghouses is being prepared and will be completed and submitted to DEQ, AQD as requested by May 27, 2019.

Baghouses 1-3 – Failure to properly dispose of collected air contaminants

- On March 26, 2019, just hours before the DEQ inspection, the facility experienced a blockage in the baghouse system and a non-routine purge of the system occurred resulting in an accumulation of saw dust in the baghouse area.
- The facility contracted with an environmental vendor to thoroughly clean the area around the baghouses with a vacuum truck on March 31, 2019. The air contaminants were properly containerized and disposed.
- The facility is planning to install two suction points with attached hoses on the exterior ductwork of the baghouses. These suction points will facilitate future routine cleaning and disposal of potential residual contaminants. The facility is currently scheduled with the contractor to install the additional suction points on May 4, 2019.

Preventative Measures

The aforementioned corrective actions were implemented promptly following the inspection inclusive of the prior scheduled filter bag replacement (Baghouse #1). Subsequent to completing the corrective actions, the inspection frequency of the baghouse area and associated duct work increased to three times per shift to ensure the system is free of leaks/visible emissions. Should visible emissions be observed the issue is reported to the area manager and the maintenance department. At the direction of the Plant Manager, the maintenance department has been instructed to prioritize the baghouse systems and promptly correct reported issues. Additionally, while the magnehelic readings associated with baghouse #2 indicated acceptable differential pressure(s), the filter bags will be inspected during the replacement of the filter bags in baghouse #3, further promoting preventative maintenance. These preventative measures have demonstrated success following implementation and will continue to be reviewed for continuity.

Should you have any questions please feel free to contact myself or Jason Jones at jasjones@jeldwen.com (217) 893-7463.

Respectfully submitted,

 4/19/2019.

Max Jones
Plant Manager

cc: Ms. Jenine Camilleri, DEQ
Mr. Jason Jones, JELD-WEN
Mr. Eric Rapp, JELD-WEN