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February 10, 2023

David Bowman, Environmental Quality Analyst
Michigan Department of Environment, Great Lakes and Energy
Air Quality Division
Gaylord District
2100 West M-32
Gaylord, MI 49735

Re: Biewer Sawmill, Inc.
State Registration Number N1722
Violation Notice Response

Mr. Bowman,

In response to your Violation Notice letter dated January 30, 2023, we offer the following response to inform you of the actions we have taken to date that address the non-compliance identified during testing of EU-WOODBOILER on November 22, 2022. We offer our responses in line with the requirements listed in the letter.

Dates the violation occurred: Testing completed on November 22, 2022 identified emission limit exceedances for particulate matter (PM) and particulate matter-10 (PM-10). We were not aware of boiler issues prior to testing. Though opacity was satisfactory, the testing firm mentioned concerns with the measured values during testing. We scheduled the original equipment manufacturer, Wellons, to complete an evaluation of the unit — boiler, multiclone, and electrostatic precipitator (ESP) — and complete boiler operator training; they were on site January 10-13, 2023. During that site visit, on 01/22/2023, Wellons discovered some causes for incomplete fuel combustion to include the Under Grate (UG) damper being restricted and not able to fully open. The damper operation was corrected that day and believed to have eliminated the inefficient combustion to return the boiler to compliance with the particulate limits of the permit. Based on testing, we are aware of noncompliance beginning 11/22/2022 and we believe it was corrected on 01/11/2023.

Explanation of the causes and duration of the violations: Improvements were implemented with the boiler to include operation, maintenance, and personnel training during the Wellons visit on January 10-13, 2023. The cause of excess particulate emissions is inefficient combustion due to poor air flow resulting in incomplete combustion of boiler fuel; primarily this was due to restricted operation of the UG damper. On 01/11/2023, it was discovered that the UG damper could only open between 0° and 20° due to a bolt on the linkage hitting the structure. Wellons corrected this issue leaving the UG damper a full range of operation of 0° and 90°. The Over Fire Air (OFA) damper and Top Overfire (TOF) damper were also maintained to return to full operations of 0° and 90°. Damper operations were corrected to allow more efficient combustion of our current fuel mixture. Personnel training was completed by Wellons to ensure boiler

operators are aware of the best "recipe" for boiler operation to maximize efficiency and fuel combustion given our fuel's moisture content. While we are unsure of the start date of the particulate emissions exceeding the permit limits, we became aware of the issues during testing and believe the issues were corrected on 01/22/2023, we estimate the violations occurred at least 2 months.

Whether the violations are ongoing: We believe EU-WOODBOILER is fully compliant with the particulate limits of Permit No. MI-ROP-N1722-2022 at this time. We have scheduled repeat testing for the week of 03/07/2023. We will be submitting the notification and test plan to the Department as required. This testing will verify the actions we have taken fully corrects the non-compliance.

Summary of the actions taken/proposed to correct the violations (with dates): Upon becoming aware of particulate issues during testing on 11/22/2022, we immediately scheduled the OEM to come on site. Wellons stayed on site nearly a full week (01/10-13/2023) to complete extensive boiler work and personnel training. The damper operation was fixed on 01/11/2023. Repeat stacktesting was scheduled as quickly as possible and will be completed the week of 03/07/2023.

Steps taken to prevent a reoccurrence: Process improvements and suggested tools to support boiler operations were identified during the Wellons visit; we will be upgrading the boiler control interface. Several maintenance items for the boiler and ESP were listed for completion during the next planned boiler outage in April. Wellons will be back on site in March for a boiler inspection and further operator training. They will continue to come on site on a bimonthly schedule for the entire year to continue to improve boiler operation and personnel training.

As identified above, we took immediate action to correct the noncompliance and have implemented significant steps to ensure full compliance in the future. We appreciate the Department's support and guidance through this process and request that you use enforcement discretion in resolving this issue.

I am available at (231)825-2855 ext 4011 or kdemel@biewerlumber.com should you have any questions or require any additional information. Information will be submitted soon regarding the repeat testing coming up.

Sincerely,

Kris Demel
Plant Manager

cc: Jenine Camilleri, Enforcement Unit Supervisor
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Air Quality Division
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