

Date: 3/12/2024

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To: April Lazzaro – Senior Environmental Quality Analyst

Subject: Inspection Report & Violation Notice

Dear April,

The following is in response from your visit to BPV Environmental on February 7th, 2024 and the two violations found: Rule 370 & Rule 910.

Date violations Occurred – February 7th

Explanation of the Cause & Duration – It was observed that BH200 was emitting paper dust outside the building through the exhaust air.

Summary of Actions – BPV Maintenance inspected BH200 on February 7th, 2024 and did not find anything obviously wrong with the bags. BPV Maintenance raked up the debris emitted outside on February 7th and disposed of properly. On February 8th BPV contacted an outside contractor and scheduled all the bags to be changed out on this baghouse February 10th. After the bags were changed, no visible emissions were evident through the bag house exhaust and the outside was again raked up of all possible emissions and properly disposed of.

Steps to Prevent Reoccurrence – A daily inspection has been implemented to visually inspect the outside of the building for particulate emissions and to check each baghouses magnahelix. If emissions are found outside building, baghouse will be turned off, inspected, and repaired before starting back up.

Further Steps to Prevent Reoccurrence of faulty bags, plugged baghouses, and overall air quality -

- 1.) Capital request submitted and approved – Air Quality Phase 1 – Replacing worn duct pipe, elbows, and with AR (abrasion resistant) steel where possible
- 2.) Other Capital requests in process as well to replace all “single style cyclones” with “dual style high efficiency” cyclones and to also install VFD (variable frequency drive) controls on blower fans so air velocities within the dust system can be controlled to maximize the efficiency of the baghouse operations.



3.) BPV is also developing a Malfunction Abatement Plan (MAP) and will be implementing this as part of the response to this violation.

Sincerely,

Jacob Draaisma
Plant Manager
BPV Environmental