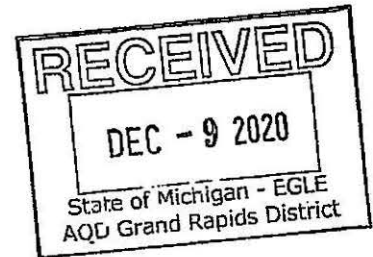


November 18, 2020

Michigan Department of Environment, Great Lakes, and Energy
Grand Rapids District Office, Air Quality Division
Attn: Eric Grinstern, Environmental Quality Specialist
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2341



RE: Aludyne Montague, LLC (B1925)
Response to EGLE October 29, 2020 Violation Notice
Permit To Install No. 41-00E
Special Conditions EU_Dryer I.2 and I.3

This purpose of this letter is to report on actions initiated to respond to the Michigan Department of Environmental, Great Lakes, and Energy (EGLE)'s Violation Notice (VN) issued to Aludyne Montague, LLC (formerly Diversified Machine Montague, LLC) on October 29, 2020. The following information is provided in alignment with details provided in the VN:

Dates Violation Occurred, Duration of Violation, and Extent to Which Violation is Ongoing:

As indicated in the September 9, 2020 stack test report, the results of the July 16-17, 2020 stack testing event indicated average results of 1.05 pounds per hour (pph) of PM-10 and PM-2.5 from the thermal chip dryer (Unit EU_Dryer) while operating the thermal oxidizer controlling emissions from the unit at a temperature of 1400 deg F. This exceeded emissions limits of 0.56 pph for both PM-10 and PM-2.5 specified in PTI 41-00E EU_Dryer Special Conditions I.2 and I. 3. While it can only be confirmed that results exceeded the permit limits during the period of the stack testing, it is possible that permit limits were exceeded approximately 150 operating days which covers periods of operation (5 days per week) from the date that the chip dryer was re-started after issuance of Permit 41-00E on January 6, 2020 through the date the operation of the chip dryer was ceased upon receipt of the preliminary stack test results on July 27, 2020. Of note, the chip dryer did not operate at all during the entire period from March 20 through May 13, 2020 due to the facility being down due to COVID-19 impacts. As operation of the chip dryer was ceased on July 27, 2020 and has not recommenced, the violation is not ongoing.

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EGLE VN Response

equipment under normal conditions with limits specified in the permit going forward.

Potential Consequences of the Violation:

Although the results of the July 16-17, 2020 stack testing event exceeded existing permit limits in PTI 41-00E, results of the NAAQS modeling (conducted under conservative assumptions of operating all equipment at capacity) indicated that operation of the EU_Dryer unit at the emission rates realized in the July 16-17, 2020 stack testing event for the period during which the dryer was operated did not result in exceedances of daily or annual NAAQS for PM-10 or PM-2.5 at the operating levels for the dryer and other particulate emitting equipment at the source.

Questions regarding this report may be directed to me at Mary.Twa@aludyne.com or 231-894-3420. Formal correspondence should be directed to me at the Aludyne Montague facility.

Sincerely,
Aludyne Montague, LLC



Mary Twa
Safety, Health, Environmental Supervisor

cc: Brad Saunders, Arcadis