



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE



DAN WYANT
DIRECTOR

October 29, 2015

Mr. Thomas Johnson
Kirtland Products, LLC
1 Altair Drive
Boyne City, Michigan 49712

SRN: N2239, Charlevoix County

Dear Mr. Johnson:

VIOLATION NOTICE

On August 10, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a copy of test results from emissions testing conducted on April 21, 2015 at Kirtland Products LLC located at 1 Altair Drive, Boyne City, Michigan. The purpose of the stack testing was to determine Kirtland Products LLC's compliance with VOC, Opacity, PM, PM10 and PM2.5 emission limits in Permit to Install (PTI) 47-11D for EUBAGHOUSE and FGGRINDER/DRYER. The test results have been reviewed by the AQD and evaluated for use in determining compliance with the permit emission limits.

Our evaluation determined that the results of testing for VOC and Opacity indicate compliance with the applicable emission limits for EUBAGHOUSE and FGGRINDER/DRYER.

The AQD evaluation of the stack test results determined that actual emissions of PM from EUBAGHOUSE are 0.004 lb/1000 lb exhaust gasses, calculated on a dry gas basis. The conditions of PTI number 47-11D limit the emissions of PM to 0.002 lb/1000 lb of exhaust gasses, calculated on a dry gas basis. This constitutes a violation of PTI 47-11D and Act 451, Rule 331, which prohibits emissions of particulate matter from any process or process equipment in excess of the maximum allowable emission rate specified as a condition of an air use permit.

The AQD evaluation of the stack test results determined that actual emissions of PM from FGGRINDER/DRYER are 0.11 lb/1000 lb exhaust gasses, calculated on a dry gas basis. The conditions of PTI number 47-11D limit the emissions of PM to 0.06 lb/1000 lb of exhaust gasses, calculated on a dry gas basis. This constitutes a violation of PTI 47-11D and Act 451, Rule 331, which prohibits emissions of particulate matter from any process or process equipment in excess of the maximum allowable emission rate specified as a condition of an air use permit.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 19, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include a program to address the cause of excess emissions and conduct future testing to

demonstrate compliance with the PM, PM10 and PM2.5 emission limits in PTI 47-11D for EUBAGHOUSE and FGGRINDER/DRYER.

If Kirtland Products LLC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that has been extended to AQD staff during inspections and stack testing of Kirtland Products LLC. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kurt Childs
Environmental Quality Analyst
Air Quality Division
231-876-4411

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Janis Ransom, DEQ