

February 29, 2016

Ms. April Lazzaro
Grand Rapids District Office
MDEQ-Air Quality Division
350 Ottawa Avenue, NW
Grand Rapids, MI 49503

Re: Violation Notice
Almond Products, Inc., Spring Lake, Michigan (SRN N6578)

Dear Ms. Lazzaro:

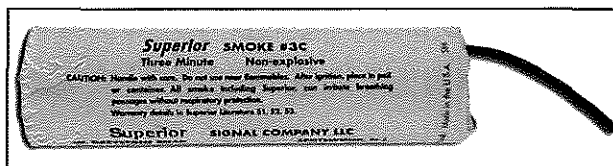
This letter is in response to your February 17, 2016 Violation Notice to Almond Products, Inc. (Almond) regarding the results of a February 12, 2016 inspection, whereupon smoke testing was performed to determine Almond Products, Inc.'s compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and the conditions of Permit to Install (PTI) number 361-06E.

The Violation Notice asserts that Almond is not in compliance with a special condition contained in Permit to Install (PTI) number 361-06E. The specific item, an explanation of the cause, and our proposed action items to resolve the issue in a timely and satisfactory matter follow.

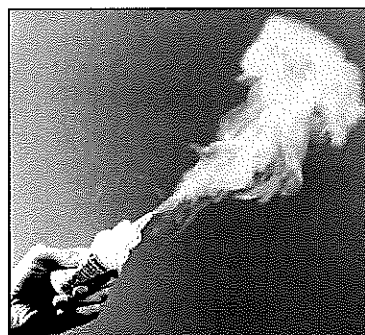
Permit No. 361-06E EUDIPLINE2

Special Condition IV.3 - Failure to install, maintain and operate the enclosure to eliminate fugitive emissions.

Upon review of the testing on February 12, 2016, Almond determined that the company contracted to perform the smoke testing misinterpreted the requirements specified in PTI 361-06E Special Condition V.3 and utilized the wrong smoke test method. Specifically, the smoke testing was performed using Superior 3C smoke signal candles as shown below.



Tel Tru T-T Puffers, as shown below were what should have been used.



During the testing, Almond determined that some areas of the enclosure were unsealed. Though Almond believes that we still would have passed the smoke testing had the proper method been used, materials were ordered the afternoon of the testing to seal the open areas. This is now 75 percent complete, with the balance to be completed by Friday, March 4, 2016.

Due to the fact that the company Almond had contracted to perform the smoke testing utilized an improper method, unbeknownst to us, Almond would like to request that this violation please be rescinded.

Almond takes environmental compliance very seriously and is committed to working with the MDEQ to resolve any issues in a timely manner. Almond will reschedule the smoke testing utilizing a different company that will use the proper procedure. Filter and Coating Technology, Inc. (FACT) has agreed to perform the testing. Almond will submit a separate letter requesting approval from the MDEQ for this testing.

If you have any questions or require additional information, please contact me at (616) 844-1813 ext. 3344 or brian.hoeker@almondproducts.com.

Sincerely,

ALMOND PRODUCTS, INC.

A handwritten signature in black ink, appearing to read "B. Hoeker", written in a cursive style.

Brian Hoeker
Vice President of Operations

cc/att: Mr. Roger Miller – Almond
Mr. Chris Stebbins - Almond
Ms. Kim Cooper - Almond
Ms. Jacquelyn F. Linck, P.E. - Fishbeck, Thompson, Carr & Huber, Inc.
Ms. Kelli Piper, CHMM - Fishbeck, Thompson, Carr & Huber, Inc.