

November 21, 2017

Ms. Kaitlyn DeVries  
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. DeVries:

This letter is in response to your November 3, 2017 Violation Notice to Almond Products, Inc. (Almond) regarding the EULINE1 thermal oxidizer destruction efficiency testing, whereupon initial testing was performed to determine Almond'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) 361-06F.

The Violation Notice asserts that Almond is not in compliance with two special conditions contained in PTI 361-06F. The specific violations and our proposed action items to resolve these issues in a timely and satisfactory matter are discussed below.

**Permit No. 361-06F – EULINE1**

***Special Condition (SC) V.2 – Failure to conduct efficiency testing within the 180 day deadline.***

The destruction efficiency testing was to be completed by October 10, 2017. Almond Products set up our stack testing contractor, Network Environmental, Inc., to conduct the testing on October 5, 2017 in the presence of MDEQ Air Quality Division representatives. It was discovered during the initial test run that the RTO destruction efficiency was below the permit limit requirement of a minimum VOC destruction efficiency of 85 percent (by weight).

***Special Condition (SC) IV.3; Rule 910 – Failure to maintain and operate the thermal oxidizer in a satisfactory manner.***

During the testing, it was determined that the RTO was at 50 – 55 percent average VOC destruction efficiency at Almond's normal temperature setting of 1460°F. Upon increasing the temperature to 1500°F, the VOC destruction efficiency climbed to 55 percent plus. Almond Products has talked to the supplier of the RTO equipment (Northwoods Industrial) as well as Network Environmental, and it has been determined that the unit has a cracked heat exchanger.

Almond Products is contracted with Northwoods Industrial to complete inspections of the RTO per our Malfunction Abatement Plan (MAP). The unit was last inspected by Northwoods Industrial on July 1, 2017 and internal preventative maintenance was performed by Almond Products on July 5, 2017. There was no indication of a cracked heat exchanger during these inspections. Almond Products sent a letter to you on October 9, 2017 identifying these issues and provided attachments documenting the inspections as well as our estimated emissions at the reduced destruction efficiency. Almond Products has determined that at 50 percent efficiency, 110 gallons of paint usage equates to 392.46 total pounds of VOC. Therefore, Almond Products will not exceed 110 gallons of paint usage in any one day on EULINE1, as to not exceed the 410.8 pound daily emission limit, until the equipment is repaired. In addition, Almond Products will run the RTO at 1500°F to achieve 55 percent destruction efficiency. With regard to recordkeeping, per discussion with the MDEQ, VOC's for paint usage on EULINE1 will be calculated using 50 percent efficiency from July 1, 2017, the date of the last RTO inspection by Northwoods Industrial, until the equipment is repaired. Almond Products will continue to remain under our VOC emission limits called out for EULINE1 in PTI 361-06F until scheduled repairs can be completed.

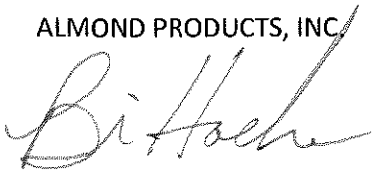
Almond Products issued a purchase order to Northwoods Industrial for a new heat exchanger on Monday, October 9, 2017. Northwoods Industrial will deliver the unit to Almond on Thursday, February 8, 2018 and install the unit on Friday, February 9, 2018. Network Environmental is scheduled to test the destruction efficiency on Wednesday, February 14, 2018, again with the MDEQ Air Quality Division present.

Almond Products takes environmental compliance very seriously and is committed to working with the MDEQ to resolve any issues in a timely manner.

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

Sincerely,

ALMOND PRODUCTS, INC



Brian Hoeker  
Vice President of Operations

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