



Kar's Nuts
1200 E 14 Mile Road
Madison Heights, MI 48071

DEQ
2700 Donald Ct
Warren, MI 48092

Bob El.
dc
Scanned 1/12/15

Mr. Robert Elmouchi,

This letter is in response to the Violation Notice received by Kar's Nut Products on December 15, 2014 citing an R 336.1901(b) violation for foul odor that was observed on November 20, 2014 by Bob Elmouchi as a representative of the DEQ. You stated that you were conducting your observation due to complaints that were filed with your department on October 8th and 16th, 2014.

While you were conducting your observation on November 20th, you gave Mike Zborowski (production supervisor and your point of contact) a courtesy call at 3:49pm stating that you were on the East side of our facility and in our neighbor's parking lot. You stated that you had been conducting your observation for a brief period of time but had detected an odor that was foul enough that it caused you to cough. You also stated that the reason that you did not invite us out to witness with you was that you had an upper respiratory infection that you did not want to share with Mike or myself citing the fact that we are a food manufacturing facility.

Moments after leaving your voicemail, Mike called me and he was instructed to complete an investigation. Mike began his investigation prior to 4pm that same day. These are the facts as they were determined at that time,

1. Mike went directly outside and across Avis road (East of facility) to the opposing sidewalk and did not detect any odor.
2. Mike checked the NWS local weather and determined that at 3:55pm the wind speed was 11.5 mph and gusting to 25.3 mph. The temperature was 24.6 degrees with a wind chill of 13.8 degrees.
3. Mike determined that at the time of the voicemail and notification of foul odor neither of our Roasters were operational. Roaster #1 was taken offline at 2:52pm. Roaster #2 went down at 3:23pm.

As for the two complaints filed in October, our investigation of the activity we conducted on the complaint dates did not identify any activity that would have contributed to any foul odors being emitted from our facility. On the date of the October 8th we were roasting only on roaster #1 and on the 16th we were roasting only on roaster #2. We were not roasting at or above the recommended capacity of the roasters on either day. The products and quantities being roasted both days were relatively

consistent other than we did not roast Kernels or Pecans on the 16th. Simply said, we were conducting business as usual.

We have taken several measures over the past year to improve the our roasting room processes to include more frequent Exhaust Stack Cleaning SOP's, Mechanical improvements to the Heat Exchangers for both of our roasters to reduce exhaust temperatures through the exhaust stacks, improved oil filtering materials and as well as overall improvements in our roaster efficiencies.

Our mission at Kar's is to be good neighbors and good corporate citizens. We feel that we have taking the steps necessary to follow this mission. We have been doing the same business at this location for over ten years and in that time we have run either or both of our roasters 10-20 hours per day anywhere from 4 to 7 days a week. From what we have been told, the complaints have only recently been sporadically filed (over about 2 years) by an individual in the business directly to the East of our facility. We have no explanation for why we are being targeted as the source of foul odors.

Dan Bailey

A handwritten signature in black ink, appearing to read 'D. Bailey', with a stylized flourish at the end.

Director of Operations