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October 12, 2014

Michigan Department of Environmental Quality Kalamazoo District Office 7953 Adobe Road Kalamazoo, MI 49009 - 3500

SRN: P0448 Cass County

Attn: Mr. Dennis Dunlap, Air Quality Division

In accordance with your letter dated October 6, 2014 (copy attached), we are forwarding the enclosed "Malfunction Abatement Plan" for our Cassopolis facility. We apologize for the misunderstanding on this matter. Our records show that the plan was completed and available at the plant in early August, 2014.

We would appreciate your cooperation concerning our delay in conducting the RTO destruction efficiency testing. Construction and installation work on the unit was a complex technical challenge. We needed to make sure that the emission test date would take place during a time where all of the start up difficulties had already been resolved. A test date 180 days from the August 29, 2013 permit date would have resulting in start up interference and related operational concerns.

Additional technical information is being provided. Kindly contact me on any questions.

Sincerely,

Burl. Fell

Bryan Fehnel, General Manager

