

November 21, 2016

Ms. Amanda Chapel
MDEQ-AQD
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, Michigan 49009-50026

Re: Violation Notice
Pro Powder, Inc. (SRN: U80080665)



Dear Ms. Chapel:

We have been in receipt of your letter dated November 3, 2016 and this correspondence represents our response to your concerns as outlined in the aforementioned letter. Your letter alleges that Pro Powder failed to obtain a permit-to-install prior to the installation of the burn-off oven and inadequate records to demonstrate compliance with an exemption.

Between October 21, 2008 and November 7, 2008 we had a similar conversation with, the then inspector, Dennis Dunlap. Our correspondence noted that based on manufacturer information our combined potential monthly emission rate would not exceed the limit of 500 lbs set by Rule 290 for particulate and natural gas combustion by-products. The process has not changed since 2008.

Based on our presentation, Mr. Dunlap acknowledged the use of Rule 290 as plausible and recommended that we maintain a log of the batches. Our interpretation of this response was that the Department acknowledged that emissions could not exceed rule limits, based upon potential-to-emit calculations, therefore records should simply involve the documentation of the number of batches cleaned per month. As a result, we have maintained a log as requested.

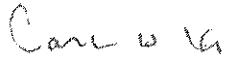
Per your recent request, we expanded the records to include the calculation of emissions for each month based on this log. These calculations document emissions to be less than 500 lbs/mo uncontrolled (i.e., without consideration of the afterburner). The calculations also identified a list of potential toxic air contaminant, along with their respective State of Michigan toxics screening level. The totals of those listed as carcinogens never exceeded 0.02 lbs (uncontrolled) in any given month. Both results are a clear demonstration that the operation is in compliance with the emission limits in Rule 290.

Your response was to indicate that the Department did not believe that the calculations were inclusive of all emissions and therefore it was the Departments determination that the data was insufficient for compliance with Rule 290. What we recognize is that the MDEQ-AQD position has changed since 2008 and that it now wants all burn-off ovens moved from exemptions to either applying for a general air permit or to go through new source review air permitting. Therefore, to move forward we will assemble a permit application and submit it to the permit unit for review.

At this point, we will plan to have an application submitted to the MDEQ-AQD Permit Unit by December 30, 2016. Should you have any questions, please direct them to me at 269-637-8722 or by e-mail at carl@propowder.com.

Sincerely,

PRO POWDER, INC.

A handwritten signature in cursive script that reads "Carl Kelch".

Carl Kelch
General Manager