



CANNON-MUSKEGON CORPORATION

2875 Lincoln Street, Muskegon, Michigan 49441
Tel. 231-755-1681

June 6, 2016

Mr. Eric Grinstern,
State Office Building
350 Ottawa Avenue NW
Unit 10
Grand Rapids, MI 49503-2341



RE: Cannon Muskegon Corporation
SRN: A4315, Muskegon County

Dear Mr. Grinstern:

The purpose of this letter is to respond to the Air Quality Division's Violation Notice that was issued to Cannon-Muskegon Corporation. It is my belief your determination that a Rule/Permit violation occurred is incorrect. I am requesting that you review the following factual information and withdraw the violation.

Historically, Cannon-Muskegon has been allowed by the state to operate a 40,000 cfm baghouse dust collector which utilized two dedicated capture hoods, an AOD hood and a charge conveyor (feeder) hood, for controlling emissions. A Permit to Install application (374-89B) was approved in 2012 when Cannon-Muskegon took it upon ourselves to enhance collection by installing a 70,000 cfm unit that would allow the using three collection hoods concurrently.

In September, 2014, Cannon-Muskegon had a fire in the AOD baghouse rendering the dust collector inoperable for the period 9/15/14 -10/2/14. As a result, a 40,000 cfm temporary baghouse was leased and operated for a total of seven days (9/22/14, 9/23/14, 9/24/14, 9/25/14, 9/29/14, 9/30/14 and 10/1/14). While this temporary unit was in use, only two collection hoods were ever activated at any one time (the 70,000 cfm unit allowed 3 hoods). The leased baghouse dust collector was also equivalent to or exceeded the specifications of the unit approved in PIT 374-89A. Therefore, taking into consideration how the temporary system was used, it should not be a violation to temporarily operate as originally permitted.

Please advise if you would like to schedule a meeting to review our melting data or to be provided with more detailed information on how the baghouse dust collectors were being used prior to and after the fire on September 15, 2014.

Sincerely

Cannon-Muskegon Corporation

Vincent Cobb
Environmental, Health and Safety Manager