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August 11, 2016

Mr. Kurt Childs
Michigan Department of Environmental Quality
120 West Chapin St
Cadillac, MI 49601

Dear Mr. Childs:

In response to your letter dated July 25, 2016, Kirtland Products provides the following information and feedback:

On July 14, AQD representatives observed two conditions which were cited as violations of Kirtland's PTI, 47-11D, as listed below:

- 1) Excess Opacity from the FGGRINDER/DRYER exhaust stack. VE readings conducted by AQD indicated a highest 6 minute average opacity of 25%.
- 2) Collected air contaminants (PM) from the EUHAMMERMILL baghouse were dumped on the ground and re-introduced to the outer air.

FGGRINDERY/DRYER EXCESS OPACITY

Kirtland's management believes the excess opacity observed on July 14 was due to improperly processed inbound material received from a new supplier. The supplier delivered wood chips from trees which had not been debarked as required. The excess bark fouled the burner system and contaminated the processed product, creating improper combustion and drying conditions.

We believe this situation to be an isolated incident, in that excessive opacity incidents have not been observed previously. Kirtland Product's maintenance team removed excess fouling material from the combustion chamber, and ran production using other material lots. Opacity observations since that time have been below limits.

The supplier in question has, in the meantime, repaired their debarking equipment, and supplies material that Kirtland can process within opacity limits.

EUHAMMERMILL BAGHOUSE

In regard to the second violation cited, it is necessary to purge the baghouse on a periodic basis to ensure proper baghouse operation. Rule 336.1370 states "Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency..." While Kirtland's management does not believe the material released from its dry hammermill baghouse escapes its

property, management is designing and constructing a water sprinkler system nonetheless. It is the company's belief that this system should knock the airborne contaminants to the ground. A system of this type is specifically authorized by R33.1370 (2)(c).

As an interim containment action, Kirtland will ensure its front end loader is onsite to collect purged material as it is released.

Kirtland hopes to have this system designed and installed in 45 working days, and will contact the AQD when this system is in place for AQD review. Management hopes that the above explanations meet the regulations cited and the conditions given in your July 25, 2016 letter.

I am happy to answer any questions you may in regard to these issues. Please feel free to contact me at 231-582-7505.

We look forward to hearing from you.

Sincerely,

Thomas Monley
President
Kirtland Products