



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
CADILLAC DISTRICT OFFICE



DAN WYANT  
DIRECTOR

January 17, 2014

Mr. Tom Johnson  
Kirtland Products, LLC  
One Altair Drive  
Boyne City, Michigan 49712

SRN: N2239, Charlevoix County

Dear Mr. Johnson:

### VIOLATION NOTICE

On January 14, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Kirtland Products, LLC located at One Altair Drive, Boyne City, Michigan. The purpose of this inspection was to respond to a notification and photographs we received regarding fallout of particulate matter from Kirtland Products and to determine Kirtland Products' compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules and Permit to Install 47-11B.

During the inspection AQD staff verified the presence of a large area of fallout of wood particulate matter located north of Kirtland Products, primarily on the Boyne City Airport property. At the time of the inspection, you confirmed that the pellet cooler (EUCCOOLER) cyclone had malfunctioned and discharged the collected air contaminants due to freezing of the collected air contaminants inside the cyclone during shutdown. A similar event occurred in February of 2013.

On January 14, 2014 you also provided me with a copy of the "Excess Pollution Incident Reporting Form" that details the incident and corrective actions to be implemented. Corrective actions consist of installing electric warming tape on the cyclone to prevent the collected material from freezing.

The improper operation of the cyclone dust collection system resulting in the release of collected air contaminants constitutes a violation of your Permit to Install No. 47-11B; General Condition 12 (Act 451, R 336.1370) which requires that collected air contaminants be removed as necessary to maintain the equipment at the required operating efficiency and to minimize the introduction of contaminants to the outer air; and EUCCOOLER IV.1 (Act 451, R 336.1910), the permittee shall not operate EUCCOOLER unless the cyclone is installed, maintained, and operated in a satisfactory manner.

Based on information Kirtland Products, LLC has already provided, AQD understands that actions have been initiated to correct the identified malfunction and prevent its

reoccurrence. Please submit a written notification to this office by February 7, 2014 (which coincides with 21 calendar days from the date of this letter) specifying the date the process modifications necessary to correct the cited violation have been or will be completed. In addition, in accordance with PTI 47-11B, EU COOLER Condition III. 1, please submit a revised MAP by February 22 (which coincides with 45 days from the date of malfunction) that addresses the corrective actions you have initiated.

If Kirtland Products, LLC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited and for the courtesy extended to me during the inspection. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below or the DEQ, Cadillac District Office, 120 West Chapin Street, Cadillac, Michigan 49601-2158.

Sincerely,



Kurt Childs  
Environmental Quality Analyst  
Air Quality Division  
231-876-4411

Enclosure(s)

cc: Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Janis Denman, DEQ