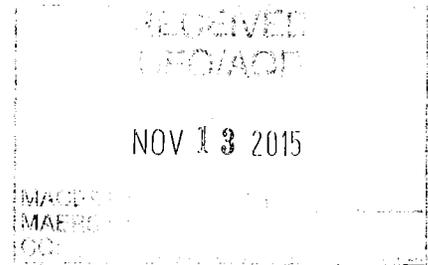




1 Altair Drive  
Boyne City, MI 49712



November 10, 2015

Mr. Kurt Childs  
Department of Environmental Quality  
120 West Chapin St.  
Cadillac, MI 49608-3960

Dear Mr. Childs:

Kirtland Products is in receipt of the October 29, 2015 Violation Notice issued by the DEQ. The Violation Notice cites Kirtland Products for violation of total PM emission limits, expressed as pounds PM per 1000 lb of exhaust gasses.

The total PM emission limits were developed assuming all PM emissions were PM10 or smaller. With this assumption, it was necessary to have the total PM emissions mirror PM10 limits in order to ensure Kirtland Products did not violate PM10 NAAQS increment regulations.

Stack testing results demonstrate that most of Kirtland's PM emissions are greater than 10 microns. Thus, the linkage between total PM and PM10 emission limits is no longer necessary, and greater total PM emission limits are possible without violating PM10 NAAQS or other limits.

In these cases, the relevant regulation is R336. Table 31, which allows limits significantly higher than Kirtland Product's PTI. Kirtland Products is applying to modify its PTI, allowing greater total PM emission limits than currently allowed, but well within R336 limits. This application has been prepared and will be sent in a few days.

Sincerely,

Thomas Johnson  
Manager, Quality Assurance  
Kirtland Products



Utilizing a renewable resource for now...for our future.

[kirtlandproducts.com](http://kirtlandproducts.com)