



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE



KEITH CREAUGH
DIRECTOR

July 25, 2016

Mr. Thomas Monley, President
Kirtland Products
1 Altair Drive
Boyne City, Michigan 49712

SRN: N2239, Charlevoix County

Dear Mr. Monley:

VIOLATION NOTICE

On July 14, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an odor survey and visible emissions observation of Kirtland Products located at 1 Altair Dr., Boyne City, Michigan. The purpose of this inspection was 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 Air Pollution Control Rules; the conditions of Permit to Install (PTI) number 47-11D; and to investigate a recent complaint which we received on July 13, 2016, regarding odors and fallout attributed to Kirtland Products operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGGRINDER/DRYER	SC I.1, 15% Opacity Limit	VE readings conducted by AQD indicated a highest 6 minute average opacity of 25%.
EUHAMMERMILL	GC 12., R 336.1370	Collected air contaminants (PM) were dumped on the ground and re-introduced to the outer air.

During this inspection it was noted that Kirtland Products FGGRINDER/DRYER was emitting opacity in excess of emissions allowed by Permit to Install 47-11D and Act 451, Rule 301(1)(c). A USEPA Method 9 reading was conducted and determined the highest 6 minute average opacity was greater than 25%. Enclosed is a copy of the instantaneous and six-minute average readings taken at Kirtland Products. This is a violation of the FGGRINDER/DRYER opacity limit of 15%.

While meeting at Kirtland Products to discuss the visible emissions from FGGRINDER/DRYER we observed the purging of collected air contaminants from the EUHAMMERMILL baghouse onto the ground and into the outer air. This is a violation of General Condition 12 of Kirtland Products PTI 47-11D and Rule 370 which requires

the collection and disposal of air contaminants in a manner that minimizes the introduction of contaminants to the outer air.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 15, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Kirtland Products 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 violations cited above and for the cooperation that was extended to me during my inspection of Kirtland Products. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

Enclosure

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Ms. Janis Ransom, DEQ
Mr. Jason Wolf, DEQ