



Good Food, Good Life



October 13, 2015

Denise Plafcan, Senior Environmental Analyst
Michigan Department of Environmental Quality
Air Quality Division
Grand Rapids District Office
350 Ottawa, NW – Unit 10
Grand Rapids, Michigan 49503

Dear Ms. Plafcan,

This letter is in response to the Violation Notice dated September 30, 2015 that was issued to Gerber Products Company. The notification alleged two violations: the first was the failure to submit notification of construction and start-up of EUBOILER 4; the second pertained to the new replacement combined stack for SVBOILERS 1 & 2 is 59 inches; PTI 45-14 limits the maximum diameter of the stack to 54 inches.

We were informed of both of these violations on September 17, 2015 during an Air Quality Division inspection of Gerber Products Company by the Department of Environmental Quality.

Notice of Construction & Start-Up: EUBoiler4 was under construction from August 2014 through February 2015. Start up and operation of the boiler commenced on July 23, 2015. Attached to this letter is the notice we submitted to address the inspection finding. To minimize the chance of similar oversights in the future, we have revised our internal practices to incorporate regulatory reporting deadlines in our project timelines.

Stack Diameter: A portion of the stack for boilers 1 & 2 is scheduled to be replaced later this year. Because the stack has yet to be installed, there is no evidence of a violation of the permit to install.

The replacement section observed during the inspection measured 58" in diameter at one end and 59" at the other end. The end measuring 58" will be at the very top of the stack, so as a point of clarity the alleged violation should note the stack is 58" and not 59" in diameter. To date, no one has actually verified the diameter of the existing stack and, therefore, the alleged violation may not have actually occurred. The new stack will replace the existing stack, which will have a diameter greater than that listed in Permit to Install (PTI) No. 726-96 and is currently listed in PTI No. 45-14.

To align the permit condition with the new stack diameter we will submit a modification request in the form of a Permit to Install Application by November 1, 2015. The application will request a change in the stack diameter from 54" to 58" in PTI 45-15, FGBOILERS, Special Condition VIII.1.



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Neither of these alleged violations has resulted in excess emissions. We trust this response addresses the issues raised in the NOV to your satisfaction. If you have any additional questions, feel free to contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Hruby".

John T. Hruby

Environmental Supervisor, Gerber Products Company