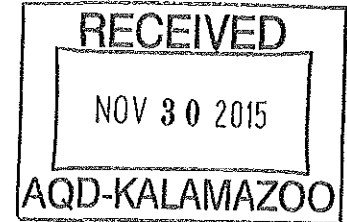




Via certified mail [7014 2870 0002 1400 5195]

November 24, 2015

Mr. Dale Turton, Senior Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division
7953 Adobe Road
Kalamazoo, Michigan 49009-5025



**Subject: Response to November 5, 2015 Violation Notice
Darling Ingredients Inc. – Coldwater, Michigan Recycling Facility
PTIO No.: 133-03A**

Dear Mr. Turton:

Darling Ingredients Inc. (Darling) is providing this response to the subject Violation Notice (NOV). The Michigan Department of Environmental Quality (MDEQ) issued the NOV November 5, 2015, (received by the facility on November 13, 2015) indicating that the Darling Coldwater facility violated permit condition Special Condition (PC) 1.4 of the subject Permit To Install and Operate (PTIO). The NOV was based on the MDEQ's inspection of the facility on October 20, 2015, and notation that *"There is no flow meter measuring the liquid flow rate to the venturi scrubber and packed tower scrubbers."* for the Emission Unit (EU)-Dryer.

As indicated in the NOV, Darling is required to initiate actions necessary to correct the cited violation and submit a written response to the NOV by November 26, 2015. The written response shall include *"an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence."*

Explanation of the Cause/Duration:

The PTIO No. 133-03 (effective April 26, 2004) was superseded by the PTIO No. 133-03A (effective October 27, 2005), both of which contained PC 1.4 and the requirement for flow meters measuring the liquid flow rates to the venturi scrubber and packed tower scrubbers for EU-Dryer. Unfortunately, Darling inadvertently misinterpreted the PC. Darling does have flow meters that record the fresh water makeup to the venturi and packed tower scrubbers and believed this to meet the need of the PC. Darling apologizes for this misinterpretation and, as described below, has already taken actions to install the appropriate flow meters.

Darling is confident that the record demonstrates that proper operation and air treatment was being provided by the venturi and packed tower scrubbers as indicated by the fresh water makeup rate flow meters and other required parametric ranges. In addition to the above-mentioned flow meters, PC

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1.4 also requires the facility to "... equip and maintain the venturi/packed tower scrubber system for EU-Dryer with pressure gauges for indicating total pressure drop across the venturi and packed tower scrubbers..." PC 1.5 requires the facility to "...keep, in a satisfactory manner, records of the pH and ORP reading of recycled scrubber solution for the venturi/packed tower scrubber system..." Darling has complied with these PCs and is confident that the requirement to maintain pressure gauges on the venturi/packed tower scrubber system as well as recordkeeping requirements for pH and ORP of the recycled scrubber solution are all additional indicators that demonstrate that these scrubbers are operating appropriately during production hours.

Summary of Actions:

The facility is in the process of procuring and installing the necessary flow meters as required by PC 1.4. Darling will notify the MDEQ once the flow meters have been installed.

Steps to Prevent Reoccurrence:

Once the facility has installed the required flow meters, the facility will maintain a maintenance schedule and operational documentation in order to ensure that the flow meters remain in place and continue their functionality.

Darling takes its environmental compliance record very seriously and appreciates the MDEQ's understanding in this matter. If you should have any questions or comments concerning this information, please feel free to contact me at your convenience at the address or telephone number listed at the bottom of the first page or you may contact me by email at dpurvis@darlingii.com.

Sincerely,

DARLING INGREDIENTS INC.



Duane Purvis
General Manager

cc: Don Muchow, District Manager (email only)
Bill Fritz, Vice President Great Lakes Region (email only)
Mike Molini, Senior Vice President Midwest Division (email only)
Doug Irvin, VP of Environmental Affairs (email only)