

**State of Michigan Department of Environment, Great Lakes, and Energy**

November 30, 2022

Dear Sir/Madam

Re: Notice of Violation Response:  
EGLE, AOD, Bay City District  
401 Ketchum Street, Suite B  
Bay City, MI 48708

Gavilon received a Violation Notice on November 16, 2022, for the Gavilon Grain, LLC Carrollton site. The violation notice has been reviewed and the violations have been addressed. Please see the following for an explanation of the cause of each violation, and how the facility has addressed the issues.

- Truck Unloading Pit (Truck unloading station exhibited opacity >5%)
  - The cause of the opacity exceedance was due to a solenoid needing replaced on the truck dump baghouse. The high volume of truck unloads, and high winds out of the south also contributed to the opacity exceedance.
  - The facility has replaced the solenoid and is closing the truck pit loading doors for all trucks where feasible. When dumping a double (a grain truck pulling two trailers), it isn't possible to close the door for the lead due to the length of the truck
- Railcar Loading Station (Railcar loading station exhibited opacity >5%)
  - The opacity exceedance was due to the last drop while loading a rail car. When the last drop occurs, the grain is no longer choked off and the spout emits dust temporarily.
  - Gavilon is evaluating engineered solutions, and best practices to avoid the opacity exceedance when the last drop occurs.
- Grain Handling Operations (Grain handling operations related to railcar loading exhibited opacity >0%) Plugging of operations due to dust bins being full. Required manual unplugging causing fallout)
  - The trackside dust tank is in poor condition and needed replacing. Poking is required at times to get the product to fall.
  - Facility is beginning to increase the frequency of the dust truck loadout to prevent plugging.
- EU-Basement Belt (Plugging of operations due to dust bins being full. Air pollution control not operating properly.)
  - The trackside dust tank is in poor condition and needs replaced. Poking is required to get the product to fall at times.
  - Facility is increasing the frequency of dust truck loadout to prevent plugging.
- Grain handling operations (Corn chafe, bees wings) fallout on resident's boat, driveway, cars, etc.)
  - Bee's wings were excessive this year due to a dryer corn at the tail end of corn harvest. In addition, heavy unloads, the solenoid that needed replaced, and the high winds contributed to the fallout.
  - The solenoid has been replaced and closing the loading bay doors for all trucks other than doubles will aid in resolving the issue. The facility has also cleaned up the dump area and increased the dust truck loadout frequency.





- Truck Unloading Pit (Door on truck receiving pit not being closed while unloading)
  - Due to the high volume of trucks and grain doubles, the doors were not always closed while dumping
  - Facility is closing the door for all trucks other than grain doubles which is not possible with the current design of the loading bay.

Should you have any queries in this regard, please do not hesitate to contact us on 1-402-889-4296 or via email at [jacob.wall@gavilon.com](mailto:jacob.wall@gavilon.com).

Sincerely,

Jacob Wallen  
Environmental Analyst  
Gavilon

cc

Jenine Camilleri – Enforcement Unit Supervisor EGLE, AQD

