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The Andersons Inc.
P.O. Box 119 • Maumee, Ohio 43537 • 419/893/5050

November 14, 2017



CERTIFIED MAIL

Mr. Rex Lane
Department of Environmental Quality
State of Michigan
7953 Adobe Road
Kalamazoo, MI 49009-5025

Reference Number: SRN: B8570, Calhoun County
The Andersons Albion Ethanol, LLC. Violation Notice

Dear Mr. Lane:

As requested in the Violation Notice dated October 27, 2017 pertaining to emissions test results for The Andersons Albion Ethanol, LLC. facility in Calhoun County, Michigan, we are respectfully submitting this response. The issue related to the emissions test result of 7.1 pounds per hour of volatile organic compounds (VOC) on the EU-Cooling Drum exceeding the permitted VOC emission limit of 3.54 pounds per hour. The violation was discovered during the emissions test on the EU-Cooling Drum on July 27, 2017.

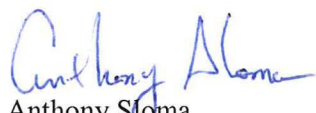
The exceedance of the permitted limit was caused by an incorrect estimate of emissions from the EU-Cooling Drum provided by ICM, the firm that provided the process engineering and construction expertise for The Andersons Albion Ethanol facility. As the use of the cooling drum was new to the Albion process, there were several variables affecting VOC content remaining in the dried distillers grains (DDGS) after the dryer that were uncertain until the process was started and emissions were tested. In some of the ICM designed processes the VOC emissions are below the estimate provided while in others the VOC emissions are above the estimate provided. The emissions are likely to have exceeded the permit limit from the time of start-up in early March and will continue until such time as the application to modify the permit is approved and a revised permit is issued.

Due to the nature of a continuous ethanol manufacturing process, there is no action that can be taken in the interim period to correct the exceedance. An application to modify the permitted emission limit for the EU-Cooling Drum was submitted to the Department of Environmental Quality on October 13, 2017. Based on the emissions test that was performed, it is expected the process will achieve compliance with the modified emission limit when the revised permit is issued.

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The Andersons is committed to contributing to a cleaner environment. We believe the timely submission of an application to modify the permit prior to issuance of this notice and the information in this response letter demonstrate our commitment to achieve compliance. If you have any questions regarding this matter, please contact me at (419) 897-3676 or tony_sloma@andersonsinc.com.

Sincerely,



Anthony Sloma
Senior Manager - Environmental Compliance