



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

July 31, 2018

Mr. Rex Lane
Michigan Department of Environmental Quality
Air Quality Division
7953 Adobe Road
Kalamazoo, MI 49009

Ms. Jenine Camilleri
Enforcement Unit Supervisor
Michigan Department of Environmental Quality
Air Quality Division
P.O. Box 30260
Lansing, MI 48909-7760

RE: The Andersons Albion Ethanol LLC
26250 B. Drive North
Albion, MI 49224



Dear Mr. Lane,

Per your request in your Violation Notice dated July 11, 2018, The Andersons Albion Ethanol (TAAE) is submitting this written response.

- **EU-GRAINRECEIVE** – The TAAE does not agree with this finding of violation as the EU-GRAINRECEIVE did not have an exceedance of the 12-month rolling period of receipts. The TAAE Compliance Spreadsheet March '17 – May '18 submitted to MDEQ detailed the monthly receipts as well as the 12-month rolling period of receipts for the “Old Grain Elevator Truck Receipts” (lines 13 and 14) which is EU-GRAINRECEIVE, the “Ethanol Elevator Truck Receipts” (lines 15 and 16) which is EU-TRUCKPIT and the “Combined Receipts” (Line 17) which is the sum of the two previous receipts. As noted in your letter, EU-GRAINRECEIVE is limited to 34 million bushels per 12-month rolling period. However, as illustrated from the spreadsheet portion included below for the period in question, the 46,089,478 bushels that you cite in your letter for March 2018 as a violation for the EU-GRAINRECEIVE is the Combined Receipts number, which is not in violation of a receiving throughput limit as EU-TRUCKPIT is not limited by throughput and therefore the Combined Receipts would not have a 34 million bushel limitation. Our listing of the 34 million bushels on Line 17 of spreadsheet appears to have created the confusion.

| | A | N | O | P |
|----|---|------------|------------|------------|
| 1 | | Mar-18 | Apr-18 | May-18 |
| 13 | Old Grain Elevator Truck Receipts (bushels-corn) | 2324059 | 1848849 | 1981050 |
| 14 | 12 mo. Rolling 34 MM bu | 21,190,931 | 20,882,907 | 21,071,676 |
| 15 | Ethanol Elevator Truck Receipts (bushels-corn) | 2383196 | 1600238 | 2424596 |
| 16 | 12 mo. Rolling | 24,898,547 | 24,758,740 | 24,926,831 |
| 17 | Combined Receipts 12 mo. Rolling 34 mil bu | 46,089,478 | 45,641,647 | 45,998,507 |

The number for EU-GRAINRECEIVE 12-month rolling period for March 2018 was 21,190,931 bushels which is below the 34 million bushel limit.

Corrective Action – To eliminate future confusion regarding this issue, TAAE has revised the Compliance Spreadsheet to clarify the appropriate emission unit designations and eliminated the confusing “34 million bu” on the Combined Receipts 12-mo. Rolling line as indicated below.

| | |
|--|----------------|
| Old Grain Elevator Truck Receipts (bushels-corn) (GRAINRECEIVE) | |
| 12 mo. Rolling 34mil bu | |
| Ethanol Elevator Truck Receipts (bushels-corn) (TRUCKPIT) | |
| 12 mo. Rolling | |
| Combined Receipts | 12 mo. Rolling |

- **FGCORNHAND** – Pressure differential gauge annual calibration or replacement documentation missing.
 - **Dates of violation** – 5/2015 through 6/2018
 - **Explanation** – The calibration or replacement of the magnehelic gauge was not included in the maintenance system due to an oversight. Previous calibration or replacement was done by personnel no longer at the facility, possibly by memory only and was not part of the documented maintenance system to ensure work continued after their departure.
 - **Status** – The violation is not on-going.
 - **Corrective Action** – The magnehelic gauges were replaced on July 30, 2018 and documentation is attached in Attachment – Magnehelic Gauge Replacement.
 - **Preventive Action** – Work order #170420 has been entered in the maintenance system for annual replacement or calibration of the magnehelic gauge.

- **EU-LOADOUT** – Pressure differential gauge annual calibration or replacement documentation missing.
 - **Dates of violation** – 5/2015 through 6/2018
 - **Explanation** – The calibration or replacement of the magnehelic gauge was not included in the maintenance system due to an oversight. Previous calibration or replacement was done by personnel no longer at the facility, possibly by memory only and was not part of the documented maintenance system to ensure work continued after their departure.
 - **Status** – The violation is not on-going.
 - **Corrective Action** – The magnehelic gauges were replaced on July 30, 2018 and documentation is attached in Attachment – Magnehelic Gauge Replacement.
 - **Preventive Action** – Work order #170420 has been entered in the maintenance system for annual replacement or calibration of the magnehelic gauge.

- **FGMILL** – Pressure differential gauge annual calibration or replacement documentation missing.
 - **Dates of violation** – 5/2015 through 6/2018
 - **Explanation** – The calibration or replacement of the magnehelic gauge was not included in the maintenance system due to an oversight. Previous calibration or replacement was done by personnel no longer at the facility, possibly by memory only and was not part of the documented maintenance system to ensure work continued after their departure.
 - **Status** – The violation is not on-going.
 - **Corrective Action** – The magnehelic gauges were replaced on July 30, 2018 and documentation is attached in Attachment – Magnehelic Gauge Replacement.
 - **Preventive Action** – Work order #170420 has been entered in the maintenance system for annual replacement or calibration of the magnehelic gauge.

- **FGMILL2** – Pressure differential gauge annual calibration or replacement documentation missing.
 - **Dates of violation** – 5/2018 through 6/2018
 - **Explanation** – The calibration or replacement of the magnehelic gauge was not included in the maintenance system due to an oversight. Previous calibration or replacement was

done by personnel no longer at the facility, possibly by memory only and was not part of the documented maintenance system to ensure work continued after their departure.

- **Status** – The violation is not on-going.
- **Corrective Action** – The magnehelic gauges were replaced on July 30, 2018 and documentation is attached in Attachment – Magnehelic Gauge Replacement.
- **Preventive Action** – Work order #170420 has been entered in the maintenance system for annual replacement or calibration of the magnehelic gauge.

- **FGFERM** – Monthly zero and configuration check on C-40 liquid flow rate monitor documentation missing.
 - **Dates of violation** – 4/2015 through 5/2018
 - **Explanation** – The monthly zero check and configuration check on the liquid flow rate monitor for scrubber C-40 was not included in the maintenance system due an oversight.
 - **Status** – The violation is on-going.
 - **Corrective Action** – The zero check cannot be done without stopping water flow to the scrubber which would leave emissions uncontrolled. A bypass will be installed during the Fall 2018 outage to allow for this check to be done without stopping water flow to the scrubber. Configuration check was completed July 30, 2018 and documentation is attached in FGFERM – C-40 Flow Rate Monitor Configuration Check.
 - **Preventive Action** – Work order #170394 has been entered in the maintenance system for monthly zero flow and configuration check on the liquid flow rate monitor for scrubber C-40.

- **FGFERM**: - Weekly visual inspection of C-40 liquid level sensor documentation missing
 - **Dates of violation** – 4/2015 through 5/2018
 - **Explanation** – The weekly inspections of the liquid level sensor for scrubber C-40 was not included in the maintenance system due an oversight. There was routine check of the scrubber liquid level on the DCS which was assumed to be sufficient monitoring of the level sensor.
 - **Corrective Action** – The weekly liquid level sensor inspection has been completed starting June 29, 2018 and documentation is attached in FGFERM – Weekly CO2 scrubber liquid level sensor checks.
 - **Preventive Action** – Work order #170419 has been entered in the maintenance system for weekly visual inspection of C-40 liquid level sensor.

- **FGOXID2** – Monthly one minute visible emission observation of RTO C-10A vent missing
 - **Dates of violation** – 3/2017 through 5/2018
 - **Explanation** – The visible emission observation documentation was not included in the maintenance system due an oversight. The visible emission observations were being done on C-10A vent at the same time as the other visible emission observations, but the work order had not been updated to ensure all sources were included.
 - **Status** – The violation is not on-going.
 - **Corrective Action** – The monthly visible emission observations for C-10A stack have been documented for June and July 2018 and documentation is attached in FGOXID2 – RTO Visible Emission Observation for each month.
 - **Preventive Action** – Work order #169312 has been updated to include the RTO stack (C-10A vent).

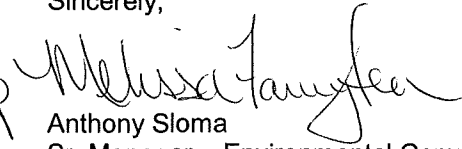
- **FGOXID2**: Annual RTO temperature monitoring device calibration documentation missing
 - **Dates of violation** – 4/2018 through 7/2018
 - **Explanation** – The calibration or replacement of the RTO temperature monitoring device was not included in the Spring 2018 due an oversight. The Thermal Oxidizer is on an annual device replacement schedule in the fall outage and the RTO schedule was

planned for the same time not considering it would exceed 12 months from the original commissioning of the device.

- **Status** – The violation is not on-going
- **Corrective Action** – The RTO temperature monitoring device replacement was completed on 7/26/2018 and documentation is attached as FGOXID2 – RTO Thermocouple Replacement.
- **Preventive Action** – Work order #172011 has been entered in the maintenance system for annual replacement or calibration of the RTO temperature monitoring device.

We appreciate your consideration of our corrective and preventive actions regarding the matters you identified during your recent inspection. Where we have not been able to correct the deficiencies at this time, we will implement corrective actions according to the plan described above to ensure compliance. Please contact Evan Dankert (evan_dankert@andersonsinc.com or 517.629.9428) or I (tony_sloma@andersonsinc.com or 419-897-3676) if you have questions or need additional information to resolve this matter.

Sincerely,

pp 

Anthony Sloma
Sr. Manager – Environmental Compliance
The Andersons, Inc.

Enclosures