



The Andersons Inc.

P.O. Box 119 • Maumee, Ohio 43537 • 419/893/5050
June 26, 2019

Ms. Amanda Chapel
EGLE
Air Quality Division
7953 Adobe Road
Kalamazoo, MI 49009

Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE
Air Quality Division
PO Box 30260
Lansing, MI 48909-7760



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

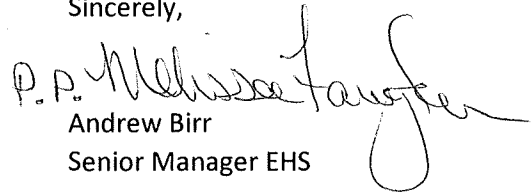
Dear Ms. Chapel:

Per your request in your Violation Notice dated June 6, 2019, The Andersons Albion Ethanol (TAAE) is submitting this written response.

- **FG-OXID** – PM10 and PM2.5 limits are 1.0 pounds per hour (pph). The average stack tested rate was 1.4 pph.
 - **Date(s) of violation** – 3/21/2019
 - **Explanation** –The PM10 and PM2.5 hourly limits were revised from 4.4 pph to 1.0 pph in a 2012 permit modification and PTI 120-5F was issued for the modification. At that time, the most recent compliance stack test (conducted in 2007) validated the revision. The measured average emission rate for PM2.5 and PM10 in the 2007 stack test was 0.6 pph.
 - We are not certain about the reason for the emission increase that has caused an exceedance of the PM2.5 and PM10 emission limitations. The capacity of FG-OXID has not changed since installation and there were no equipment or operating anomalies observed during the stack test. Therefore, the emission increase may just be due to qualitative process or feedstock changes compared to the 2007 stack test.
 - **Corrective Action** – Conversations with our permit writer at EGLE have commenced and an application for permit modification to increase the emissions rate above the recently stack tested average will be submitted by June 26, 2019.

We believe the information in this response letter demonstrates our commitment to achieve compliance. If you have any questions regarding this matter, please contact me at (419) 891-2976 or andy_birr@andersonsinc.com.

Sincerely,

A handwritten signature in black ink, appearing to read "P. P. Melissa Taylor". The signature is written in a cursive style with a large loop at the end.

Andrew Birr
Senior Manager EHS