



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

November 22, 2022

Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
P.O. Box 30260
Lansing, MI 48909-7760

Ms. Amanda Cross
EGLE, AQD, Kalamazoo District
7953 Adobe Road
Kalamazoo, MI 49009

RE: NOV for SRN: B8570, The Andersons Marathon Holdings LLC Albion Facility

In Response to the Violation Notice issued on November 10th 2022 for the Anderson's Marathon Holdings LLC-Located at 26250 B Drive North, Albion Michigan:

The dates to which the violation occurred are as follows:

During the most recent plant outage October 3rd-12th 2022, the RTO (C-10A) controlling emissions from emission unit FGOXID2 was serviced, cleaned, and placed back online October 12, 2022. During this outage, the rotor sealing/gasket material within the RTO combustion chamber was evaluated. However, it is believed the rotor sealing/gasket material has failed to seat properly, allowing untreated gas to bypass the combustion chamber. During a planned stack test on November 3rd it was discovered that VOC emissions exceeded the permitted limit. This exceedance is ongoing.

Based on Original Equipment Manufacturer (OEM) recommendations, TAMH LLC made adjustments to recirculate treated gas back into the RTO to lower the VOC measurements to 9.74pph. On November 28th-30th, the RTO will be serviced to repair/replace the rotor sealing/gasket material which is believed to be the root cause of the emission exceedance. Upon repair, the system will be put back online and stack tested on December 9th for accuracy. The Rotor sealing/gasket will be evaluated and replaced during future plant outages to prevent a reoccurrence.

Sincerely,

A handwritten signature in blue ink, appearing to read "Evan Dankert".

Evan Dankert
Senior EHS Specialist

RECEIVED
DEC 07 2022
AQD - KALAMAZOO