



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

November 10, 2022

Harley Darnell
The Anderson's Marathon Holdings, LLC
26250 B Drive North
Albion, Michigan 49224

SRN: B8570, Calhoun County

Dear Harley Darnell:

VIOLATION NOTICE

On November 1-3, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed a scheduled stack test at The Anderson's Marathon Holdings, LLC located at 26250 B Drive North, Albion, Michigan. The purpose of this stack test was to demonstrate the Facility's continued compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B8570-2015b for emission limits established for EU-COOLINGDRUM, FGMILL2, and FGOXID2.

During the stack test, the following was observed:

Process Description	Rule/Permit Condition Violated	Comments
FGOXID2	Special Condition (SC) 1.3 in MI-ROP-B8750-2015b	FGOXID2 is limited to 4.5 pph VOC. As determined by a gas probe, the VOC emissions are currently 9.74 pph. Exceedances are ongoing.
FGOXID2	SC VI.1 in MI-ROP-B8570-2015b	The permittee shall not operate FGOXID2 unless thermal oxidizer C-10A is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the thermal oxidizer according to the MAP. The thermal oxidizer shall be capable of attaining a minimum VOC

		destruction efficiency of 98 percent by weight, and maintaining the combustion chamber temperature of the thermal oxidizer at not less than 1400°F or not less than 50°F below the average combustion chamber temperature at which the VOC emission limit was met during the most recent compliance test, whichever is higher
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On November 3, 2022, the facility had scheduled testing on FGOXID2. Technical Program Unit's (TPU) Lindsey Wells, was on site to observe the testing. When a gas probe was placed in the stack, the readings for VOC numbers were determined to be higher than the previous stack test results and would exceed the VOC emission limit as established in FGOXID2 in MI-ROP-B8570-2015b.

The facility verbally reported to EGLE that the probe was showing emissions of about 14.4 pph VOC and the destruction efficiency was below the 98% required by the permit. The permitted VOC limit for FGOXID2 is 4.5 pph. In discussion with EGLE field staff, the facility concluded that there was likely a failure somewhere within the RTO associated with FGOXID2. The facility, with input from EGLE field staff, decided to postpone the testing until the pollution control equipment could be repaired and emissions were more representative of routine normal operating conditions.

In email communication from the facility, dated November 8, 2022, it was reported that the RTO continues to not function properly. Based on original equipment manufacturer (OEM) recommendations, the facility made adjustments to recirculate treated gas back into the RTO and VOC measurements now read 9.74 pph. The facility reports they are working to schedule repairs to the RTO and will continue to operate the RTO, as above, minimizing excess emissions, and tracking emissions compared to the facility-wide VOC limit.

The facility also reported the RTO associated with FGOXID2 was put back online on October 12, 2022, after the most recent shutdown and equipment service. During the shutdown, the sealing/gasket material they believe is causing the failure would have been evaluated.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 1, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. Any documentation of maintenance or service should be provided at this time, as well.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If The Anderson's Marathon Holdings, Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my observation of schedule stack testing at Anderson's Marathon Holdings, LLC. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Amanda Cross
Senior Environmental Quality Analyst
Air Quality Division
(269)910-2109

cc:

Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Rex Lane, EGLE
Evan Dankert, Anderson's Marathon Holdings, LLC
Tony Sloma, Anderson's Marathon Holdings, LLC