



October 25, 2021

**Certified Mail**

State of Michigan (EGLE)  
Air Quality Division Lansing District  
Constitution Hall, First Floor South  
525 W. Allegan  
Lansing, MI 48933

RE: Response to October 4, 2021 Notice of Violation  
ADM Grain Company – Webberville, MI  
SRN: B8863, Ingham County

To Whom It May Concern:

This letter is in response to the Violation Notice issued on October 4, 2021 to the ADM Grain Company (Company) facility located at 2700 N. Stockbridge Road, Webberville, MI (Facility). The Company appreciates the opportunity to respond to the Agency's concerns.

Below, we list the allegation followed by the Company's detailed response.

Description of Allegation:

Michigan Rule 301 (Act 451, Chapter 336.1301) states, among other things, that a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than a 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity. During an Air Quality Division inspection on August 31, 2021, the Agency observed visible emissions exceeding the 20% opacity standard while trucks were loaded with corn.

Response:

After reviewing the inspection photos shared by the Agency, we acknowledge the need to further reduce emissions when loading trucks from the bin loadout spout highlighted by the Agency. Although the Agency did not provide results of a Method 9 test, the photographs shared by the Agency indicated opportunities for improvement on the infrequently used bin loadout spout depicted.





Since the inspection, the Company completed the following improvements at the Facility –

- Created a custom transition piece sized for the bin loadout spout
- Installed the custom transition piece, along with several elbow pieces, which slowed the velocity of the grain from the bin loadout spout when compared to the velocity from the bin loadout spout observed during the inspection
- Enclosed the top of the bin loadout spout
- Added a dust sock to the end of the bin loadout spout that will be inside the vessel during the truck loading process (See attached photo)
- Updated the relevant standard operating procedure to reflect the above-described changes
- Trained affected employees about the above-described changes to the equipment and SOP

We believe our prompt evaluation of the Agency's concerns and timely steps taken to address them demonstrates the Company's commitment to compliance.

If you have any questions or would like any additional information, please contact me at [beth.york@adm.com](mailto:beth.york@adm.com) or (217)451-2476.

Sincerely,

Beth York  
Area Environmental Manager

cc: Ms. Jenine Camilleri, EGLE

Attachment



ATTACHMENT

