



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

July 14, 2023

VIA EMAIL AND MAIL

Dan Hofbauer
Crimson Holdings, LLC
1336 East Maumee Street
Adrian, Michigan 44333

SRN: E8117, Lenawee County

RE: Violation Notice Response

Dear Dan Hofbauer:

On June 14, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an odor observation around Crimson Holdings, LLC, located at 1336 East Maumee Street, Adrian, Michigan. The purpose of this odor observation was to investigate ongoing complaints regarding foul odors attributed to Crimson Holdings operations.

On June 22, 2023, the AQD sent Crimson Holdings a Violation Notice (VN) citing violations discovered as a result of the odor observation and requested a written response by July 6, 2023. AQD received Crimson Holdings response on July 6, 2023. Upon further review the AQD requests that Crimson Holdings commit to further interim odor mitigation measures.

In the VN response, Crimson Holdings provided an Action Plan to address the odors and cited violation. This includes the use of a new odor neutralizer in place of the ChemTreat OC9118, altering the facility's scheduling of incoming raw product, and the modification of the current stack's taper from 38 inches to 36 inches. Crimson additionally has proposed that a wet packed bed scrubber will significantly mitigate or resolve nuisance odors from the egg drying process. We understand that it will be installed and operational on or about December 22, 2023. Meanwhile, the facility is currently restricted by a local court order in its operations from "dawn to dusk" (allowing operations from 7pm to 7am).

While the current court order restricting the facility's operating hours will reduce the likelihood of odors impacting the surrounding community, AQD does not believe the immediate mitigation actions are sufficient to prevent continued nuisance odors in violation of Rule 901(b). In fact, it appears that acceptance of a load of eggs outside the review parameters for egg delivery loads, the pending implementation of the new odor neutralizer, and the tapering of the current stack were the only measures not already implemented on June 14, 2023.

AQD requests Crimson Holdings consider additional actions to control nuisance odors between now and the time the wet packed bed scrubber is operational. These actions may include but are not limited to the following:

- A detailed engineering analysis as to why additional fans/blowers cannot be added to the stack to increase velocity. In the VN response, Crimson Holdings states that "the design and proper operation of the dryer is sensitive to back-pressure and airflow, making it difficult to add additional fans". Please provide detailed engineering

Dan Hoffbauer
Crimson Holdings, LLC
July 14, 2023
Page 2

- information to support this claim or otherwise commit to the installation of a booster fan to increase stack velocities.
- A voluntary commitment, separate from any court orders the facility may be subject to, to continue facility operations under a reduced schedule until installation of the control device. AQD recommends the company consider further limiting facility operations to the hours of 9:00pm to 6:00am, to further reduce impacts of odors from community outdoor activities, and from atmospheric inversion conditions during dawn and dusk.
 - An updated installation schedule for the facility's proposed packed bed scrubber system.

Please provide the requested information by July 28, 2023, (14 days from the date of this letter).

If you have any questions, please contact me at the number listed below or Stephanie Weems at 517-416-3351.

Sincerely,



Scott Miller
Jackson District Supervisor
Air Quality Division
517-416-3351

cc: Lillian Woolley, Fishbeck
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Stephanie Weems, EGLE
Jill Greenberg, EGLE
Greg Elliot, Adrian City Administrator
John J. Gillooly, Garan Lucow Miller, P.C.