



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

July 21, 2022

EMAIL AND CERTIFIED MAIL-RETURN RECEIPT

Dan Hofbauer
Crimson Holdings, LLC
1336 E Maumee Street
Adrian, MI 49221

SRN: E8117, Lenawee County

Dear Dan Hofbauer:

VIOLATION NOTICE

On July 15, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an odor observation in the area of Crimson Holdings, LLC, located at 1336 East Maumee Street, Adrian, Michigan. The purpose of this odor observation was to investigate ongoing complaints which AQD continues to receive regarding foul odors attributed to Crimson Holding, LLC's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Powdered egg manufacturing facility	R 336.1901(b)	On July 15, 2022, AQD staff followed up on ongoing complaints that were received concerning odors coming from this facility. AQD staff were able to verify these odors were in violation of Rule 901(b).

The AQD staff detected odors in a business/residential area near the company. The odors were impacting residents and nearby commercial businesses. In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency and duration so as to constitute a violation of Rule 901(b) of the administrative rules promulgated under Act 451.

On May 26, 2022, the AQD issued a Violation Notice for similar violations. As noted during this recent investigation, these nuisance odors are continuing and have not been adequately addressed by the company. Crimson Holdings has completed some facility revisions to address ongoing odors, including installation of a carbon filter on the Dissolved Air Flotation Room, vertical alignment of the solids tank vent, and air emission stack testing. However, significant odors continue to impact the community, and Crimson Holdings has not yet completed corrections to the main facility stack – which AQD believes is the primary source of nuisance odors. AQD strongly advises Crimson Holdings, LLC to work as quickly as possible to implement the corrections to the facility's main stack. As AQD modeling of these emissions has

Dan Hoffbauer
Crimson Holdings, LLC
July 21, 2022
Page 2

demonstrated, the proposed change to the stack will help in mitigating the impact of the nuisance odors experienced by nearby residents and businesses. AQD also requests the facility submit the remainder of the stack test data as soon as possible but no later than July 29, 2022. Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by **July 28, 2022**, (which coincides with 7 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Jackson District, at 301 East Louis Glick Highway, Jackson, Michigan 48909-7760 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Crimson Holdings, LLC 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 violation cited above and for the cooperation that was extended to me during my inspection of Crimson Holdings, LLC. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact Stephanie Weems at 517-416-3351, or me at the number listed below.

Sincerely,



Scott Miller
Jackson District Supervisor
Air Quality Division
517-416-5992

cc:

Annette Switzer, EGLE
Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Stephanie Weems, EGLE
Diane Kavanaugh Vetort, EGLE