



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



DAN WYANT  
DIRECTOR

July 24, 2014

Mr. Len Fisher, General Manager  
Farmers Co-Operative Grain Company  
338 Main Street  
Kinde, MI 48445

SRN: M1860, Huron County

Dear Mr. Fisher:

**VIOLATION NOTICE**

On May 14, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Farmers Co-Operative Grain Company located at 338 Main Street, Kinde, Michigan. The purpose of this inspection was to determine Farmers Co-Operative Grain Company's 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 administrative rules and the federal Standards of Performance for New Sources (NSPS) for grain elevators (40 CFR, Part 60 Subpart DD).

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Truck unloading/loading station	40 CFR, Part 60.7 (a) (1)	30 day initial notification not received
Truck unloading/loading station	40 CFR, Part 60.8 (a)	Performance Test

This process is also subject to the federal Standards of Performance for New Sources (NSPS) for grain elevators. These standards are found in Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart DD.

The AQD mailed an outreach letter to Farmers Co-Operative Grain Company on April 28, 2014 and met with the facility on May 14, 2014 to discuss the applicable requirements of NSPS DD. During our meeting we discussed that the grain elevator expanded in 2013 and reached 2.8 million bushels of permanent storage capacity. As part of this project an additional dump pit and grain dryer were installed. We also discussed NSPS requirements including submitting an initial notification, annual reporting of emissions to the MAERS system, and performance testing. The facility stated that the dump pit (*affected facility*) had not been sized appropriately and that they were working with the contractor to resolve this issue. The facility expressed that since testing was required they would like to test once the dump pit was sized appropriately.

The facility said that they would remain in contact with the AQD on this matter. On June 17, 2014 staff had not received an update on the status of the re-sizing of the affected facility, an email was sent, and the response noted that no initiative had been taken to resolve this matter.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 14, 2014 (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.

If Farmers Co-Operative Grain Company 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 inspection of Farmers Co-Operative Grain Company. 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,



Gina L. McCann  
Environmental Quality Analyst  
Air Quality Division  
989-894-6218

GLM/ai

Enclosure(s)

cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Hare, DEQ