



February 26, 2014

Michigan Department of Environmental Quality
Air Quality Division
Kalamazoo District Office
Attn: Dorothy Bohn
7953 Adobe Rd
Kalamazoo, MI 49009-5025



**Re: Violation Notice Response
Cargill, Incorporated – Ag Horizons
110 East Sherwood Street, Decatur, MI
State Registration No. M3654**

Dear Ms. Bohn,

Cargill submits this letter in response to the Violation Notice dated February 13, 2014 regarding the alleged violation for performance testing to be conducted by February 12, 2014 under Permit to Install No. 103-13 and the New Source Performance Standard. Cargill acquired the grain elevator from Northstar Grain in July 2013 and suspended facility operations until the required air permit was issued. Because Cargill had determined that the installation of additional pollution control devices is necessary to ensure continuous compliance with permit conditions, a request to extend the test date to allow for the installation of the planned control equipment was submitted to the Department on January 30, 2014.

The compliance testing referenced in the Permit to Install No. 103-13 for the South Receiving Pit 2 (SR2) and North Rail Loadout 1 (NRL1) was not completed by the February 12, 2014 due date. Cargill is continuing to work on the installation of emission controls for SR2 and NRL1 on an expedited basis and will complete the reference testing after the controls are installed and the elevator reaches maximum capacity. Since the acquisition, the corrective actions taken place to comply with the testing requirement have included a full evaluation of control alternatives, the initial engineering of control systems for SR2 and NRL1, and the purchase of the SR2 dust collector.

The installation of the SR2 dust collector is schedule to be completed by June 30, 2014, as follows:

- February 3: Equipment ordered;
- Lead times on equipment is 10 to 13 weeks;
- March 28: Begin construction of dust collector system;
- Late April: Receive dust collector and other major equipment; and
- June 30, 2014: Complete the install of the dust collector.

The installation of the NRL1 control unit is schedule to be completed by August 31, 2014, as follows:

- March 28: Receive bids for equipment and contractor;
- April 28: Award equipment and contractor bid;
- Lead times on equipment is 10 to 13 weeks;
- June 23: Begin construction of dust collector system;
- July 28: Receive dust collector and other major equipment; and
- August 31, 2014: Complete the install of the dust collector.

During the control units' installation period, Cargill will continue to operate the elevator in a manner to reduce fugitive emissions and maintain the reduced permitted throughput limit. Under the proposed installation schedule, the controls will be in place and testing will be conducted at the start of the 2014 harvest season to allow for maximum operating capacity.

Cargill has demonstrated our commitment to operate in full compliance with regulations while reducing emissions from our elevator. Upon the installation of the control equipment and the completion of the testing, the elevator will be in full compliance with the permit and standards.

If you have questions or would like to discuss further, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Borrie". The signature is fluid and cursive, with a large initial "M" and "B".

Michael Borrie
Plant Manager