Zeeland Farm Services, Inc.®

February 26, 2024

Via E-mail
Chris Robinson
Environmental Quality Analyst
Michigan EGLE-AQD
Grand Rapids District Office
State Office Building, 5th Floor
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2341
RobinsonC17@michigan.gov

Re: Violation Notice
ROP: MI-ROP-M4204-2018b
Zeeland Farm Services, Inc. (SRN: M4204)

Dear Mr. Robinson:

Zeeland Farm Services, Inc. (ZFS) respectfully submits this response to the violation notice ("VN") that Air Quality Division ("AQD") issued on January 30, 2024. As confirmed via our e-mail correspondence on February 15, 2024, this response is submitted by the extended deadline approved by AQD.

The VN noted that the stack dimensions of three (3) boilers did not meet the permitted dimensions included in Renewable Operating Permit (ROP) number MI-ROP-M4204-2018b. As you may recall, ZFS first reported these concerns last year. That "self-report" was followed by discussions with AQD staff about related permitting and compliance considerations.

Following up on ZFS' e-mail to Mark Mitchell, the table below summarizes the permitted and the actual dimensions of the boiler stacks.

Emissions Unit	Permitted Dimensions		Actual Dimensions	
	Maximum Diameter (in)	Minimum Height (ft)	Diameter (in)	Height (ft)
EUBOILER	25	63	***26***	***54.4***
EULF/NGBLR5	13	29.8	***13.5***	30
EUREFBOILER	13	55	***24***	56.2[1]

[1] There were conflicting dimensions reported for the EUREFBOILER height, but the 56.2' height was confirmed in February 2023 when repairs were made to the stack following severe weather.

P.O. Box 290 • 2525 – 84th Avenue • Zeeland, Michigan USA 49464-0290
616.772.9042 • 800.748.0595 • F: 616.772.7075
www.zfsinc.com

The discrepancy in stack dimensions is due to changes that occurred during installation, but were not identified by ZFS. In fact, the discrepancies in stack dimensions were not identified until July 2023, during an internal review. The information was then brought to the attention of the EGLE on July 21, 2023.

Once the discrepancy of the stack dimensions was identified, ZFS reached out to AQD to discuss possible responses. At the time, ZFS reminded AQD that previous air dispersion modeling overestimated PM_{10} and $PM_{2.5}$ at this location, such that the facility could not meet the NAAQS. In fact, because previous air dispersion modeling could not show compliance, the facility conducted ambient air monitoring in 2013 – 2015 to show compliance with NAAQS for PM_{10} and $PM_{2.5}$. Results of the ambient air monitoring document compliance based on the "as installed" stack dimensions.

ZFS initially sought to revise the PTI based on the strength of the monitored NAAQS compliance, thereby adopting the "as installed" stack dimensions. AQD permit staff later rejected that proposal. Since then, ZFS has been actively considering different strategies, including engineering solutions for the underlying operations, the stacks, and potential controls. Unfortunately, ZFS has yet to identify a final option. Complicating the analysis is the fact that modifying the stacks to the permitted dimensions may inadvertently limit boiler output by up to 50% or more, an issue that only recently became apparent. Prior to that, ZFS was planning to simply meet the stack dimensions identified in the ROP and underlying PTI.

Based on the continuing development of a compliance strategy, ZFS proposes to provide you with a biweekly status report about this issue. In addition, ZFS is amenable to a meeting with AQD to discuss this situation if desired.

If you have any questions regarding this submittal, please contact me at bridgetter@zfsinc.com or 616-879-1711.

Sincerely,

Zeeland Farm Services, Inc.

Bridgette L. Rillema

Bridgette L. Rillema, P.E.
Environmental Manager

cc: Lynn Esp, ZFS