



September 22, 2022

Cody Yazzie
Environmental Engineer, Air Quality Division
Michigan Department of Environmental Quality
350 Ottawa Avenue NW, Unit 10
Grand Rapids, Michigan 49503

Subject: Response to Violation Notice Dated August 11, 2022

Reference: Hudsonville Ice Cream
345 East 48th Street, Holland, MI 49423

Dear Mr. Yazzie:

This letter is submitted in response to the subject Violation Notice (VN) that was issued last month to Hudsonville Ice Cream (Hudsonville), 345 E. 48th Street, Holland, Michigan. The VN states that Hudsonville installed and commenced operation of the anhydrous ammonia-based refrigeration systems without having a required Rule 201 air permit.

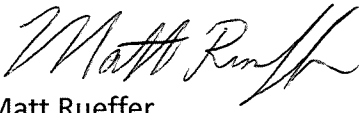
Hudsonville believes that the sealed ammonia-based refrigeration systems at our Holland manufacturing facility are exempt from the Rule 201 permitting requirement because of the minimal associated releases of ammonia. While the current Rule 280(2)(a) exemption applies only to systems having an anhydrous ammonia storage capacity less than 500 gallons, we believe the sealed refrigeration equipment for these systems has minimal atmospheric losses such that these systems qualify for an exemption under Rule 290.

The anhydrous ammonia (NH₃) refrigeration systems at our facility are utilized to refrigerate and freeze perishable ingredients and products. These pressurized closed loop refrigeration systems are not traditional emission units since they are sealed and do not emit ammonia to the atmosphere as part of their normal operation. Instead, small releases which occasionally occur from system leaks are quickly repaired, and non-condensibles are regularly purged from the system and directed to the wastewater system. Any ammonia associated with these non-condensibles is discharged to the wastewater collection system as ammonium hydroxide. Ammonia gases released to atmosphere are negligible.

To resolve the subject VN, Hudsonville plans to prepare and submit to EGLE AQD an exemption evaluation that addresses the criteria and thresholds of Rule 290. This evaluation will also address the requirements under Rule 278a. We will submit this evaluation to your attention no later than October 31, 2022.

If you have any questions, please call Mike Hart at (616) 299-7630, myself at (616) 970-2622, or Mark Horne of Environmental Partners at (616) 928-9128.

Sincerely,
HUDSONVILLE ICE CREAM

A handwritten signature in black ink that reads "Matt Rueffer". The signature is written in a cursive, flowing style.

Matt Rueffer
Director of Engineering & Maintenance

cc: Mary Ann Dolehanty, EGLE AQD
Annette Switzer, EGLE AQD Permit Section
Christopher Ethridge, EGLE AQD
Brad Myott, EGLE AQD
Jenine Camilleri, EGLE AQD
Mike Hart, Hudsonville Ice Cream
Mark A. Horne, P.E., Environmental Partners, Inc.