



 CARO  
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May 20<sup>th</sup>, 2022

EGLE, AQD  
Bay City District Office  
401 Ketchum Street, Suite B  
Bay City, MI 48708

Dear Mr. Shaffer,

POET Biorefining-Caro, LLC (POET) is responding to the violation notice given from the State of Michigan, Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD), regarding deviation from the Renewable Operating Permit (ROP) number MI-ROP-N6996-2018a.

**Time and Date:** 9:13AM on April 26, 2022 until 10:36PM on April 27, 2022.

**Reason:** A Clean-In-Place (CIP) process upset that later led to malfunctioning Scrubbers.

**Duration:** Approximately 38 hours

POET submitted a Rule 912 Initial Notification to the AQD on May 3, 2022 related to an emission exceedance of POET's ROP. On April 22, 2022 POET performed a CIP in Wasteheat. During this CIP, oil residue inadvertently entered Scrubber 1. During scheduled engineering testing on April 26, 2022, acetaldehyde emissions exceeded POET's ROP limit of 1.50 lbs/hr. In response to this, POET cleaned Scrubber 1 with process water to remove any foreign material that resulted from the process upset. Similar emission rates were measured during subsequent engineering testing. Scrubber 1 was taken offline and a thorough CIP was performed utilizing Caustic and the blower speed was lowered. While performing this CIP, the team turned on Scrubber 2 and discovered mechanical limitations concerning the water flow. As a result, VOC emissions exceeded POET's ROP limit of 19.66 lbs/hr during engineering testing on Scrubber 2. Scrubber 2 was utilized until CIP of Scrubber 1 was completed on April 27, 2022.

On April 28, 2022, at 8:53AM, engineering testing indicated that acetaldehyde emissions of Scrubber 1 was within the ROP limits and remains within compliance of the ROP. To prevent recurrence of this issue, an annual CIP of Scrubber 1 has been created in the online Preventative Maintenance program, the interlock to stop flow on the Distillate Tank leading to Scrubber 1 was increased to ensure residue does not exit the tank, and POET is installing a port on the Distillate Tank to remove residue that settles on the top.

Concerning Scrubber 2, design modifications have been made to allow for increased water flow in and out of Scrubber 2 to reduce VOC emissions to align with the ROP. Engineering testing will be conducted prior to turning Scrubber 2 back on.

A copy of this letter has also been submitted to Jenine Camilleri, Enforcement Unit Supervisor at EGLE. If you need additional information or have questions, please feel free to call Emily McPhail at (989) 286-3913 or via email at [Emily.McPhail@poet.com](mailto:Emily.McPhail@poet.com).

Sincerely,

Emily Boynton  
General Manager