



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
BAY CITY DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

May 11, 2022

Emily Boynton
POET Biorefining - Caro, LLC
1551 Empire Drive
Caro, Michigan 48723

SRN: N6996, Tuscola County

Dear Emily Boynton:

VIOLATION NOTICE

On May 3, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a Rule 912 Initial Notification of a Volatile Organic Compound (VOC) and acetaldehyde emission limit exceedance by POET Biorefining - Caro, LLC located at 1551 Empire Drive, Caro, Michigan. The purpose of Rule 912 Initial Notification was used to determine POET Biorefining - Caro, LLC'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 Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N6996-2018a.

During a review of the initial notification provided, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFERM&DIST	MI-ROP-N6996-2018a, FGFERM&DIST, Special Condition (SC) I.1	VOC emission exceedance while venting to the scrubber
FGFERM&DIST	MI-ROP-N6996-2018a, FGFERM&DIST, SC I.3	Acetaldehyde emission exceedance

A Rule 912 Initial Notification was submitted to the AQD on May 3, 2022. On April 22, 2022, while performing a clean-in-place, oil residue invertedly entered Scrubber 1. During scheduled engineering testing on April 26, 2022, elevated levels of acetaldehyde that exceeded the hourly limit of 1.50 lbs/hr were identified. Action was taken to address the emission limit exceedance and while this was being completed mechanical limitations occurred on Scrubber 2 that resulted in elevated VOC emissions that exceeded the hourly VOC emission limit of 19.66 lbs/hr.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 1, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

Emily Boynton
PORT Biorefining – Caro, LLC
Page 2
May 11, 2022

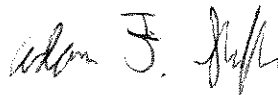
violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If POET Biorefining – Caro, LLC 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 POET Biorefining - Caro, LLC. 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,



Adam Shaffer
Environmental Quality Analyst
Air Quality Division
989-225-4789

cc: Emily McPhail, POET
Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Chris Hare, EGLE