MICHIGAN WOOD FUELS

July 18, 2019

Mr. Cody Yazzie
Environmental Engineer
Air Quality Division
Department of Environment,
Great Lakes,and Energy
State of Michigan
7953 Adobe Road
Kalamazoo, Michigan 49009-5025

Dear Mr. Yazzie:

This letter is in response to your notice of June 21st, 2019 alleging exceedances of Special Condition III.3 of our permit, which restricts the maximum inlet temperature of our rotary wood dryer (EUDRYER) to 825 degrees Fahrenheit.

Our company takes its obligations under the permit and responsibility to protect the environment seriously, and would never intentionally violate any provision of the permit. In fact, our business is based on supplying a locally produced, carbon-neutral alternative to fossil fuels.

It is true that we exceeded 825F at the dryer inlet on occasion. This has generally happened during colder months when the energy required to dry green wood is greater. For example, in the first four months of this year we exceeded 825F at the dryer inlet on the following dates:

- January 8, 9, 22, 23, 24
- February 6, 7, 12, 14, 15, 18, 19, 20, 21, 22, 25, 28
- March 1, 4, 5, 7, 11, 14, 18, 19, 20, 21,
- April 10

However, we do not consider any of these events an exceedance because we have always interpreted the limit to be a daily average, similar to our wood fuel limit in EUBURNER Special Condition IV.2 of the permit. For instance, your letter notes that on February 25th we had *"an eight-hour inlet temperature exceedance"* but the daily average inlet temperature was only 739F. Using a daily average, none of the above-mentioned dates would be in exceedance of the 825F limit therefore we believe that we have never been out of compliance with the 825F limit.

Michigan Wood Fuels LLC
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Nonetheless, your letter indicates that you believe that the dryer inlet temperature limit is absolute and no averaging period is allowed for compliance purposes. Though we feel this interpretation is unreasonably strict, we have directed our operators to take immediate action to bring down the inlet temperature whenever it reaches 825F.

In addition, we recently discovered that the thermocouple that measures the dryer inlet temperature was located far upstream of the actual dryer inlet. We believe that this location significantly overstated the recorded inlet temperature. Therefore, a few weeks ago we relocated the thermocouple to be closer to the dryer inlet so that it provides a more accurate measurement of the hot gases entering the dryer.

Lastly, I'd like to commend you and your colleagues for the detailed Activity Report that you attached to your letter. It is the most thorough and professional report of its kind that I have seen.

If for any reason you feel that this response does not adequately address the concerns raised in your June 21st letter, please contact me at (312) 953-5535 or via email at: brose@geneva7.com.

Sincerely,

Ben Rose

Benjamin L. Rose
Chief Executive Officer

cc: Jenine Camilleri, EGLE
Matthew Kwiatkowski, ERM

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