



September 20, 2016



Mr. Eric Grinstern  
Environmental Quality Specialist  
Air Quality Division  
Department of Environmental Quality  
350 Ottawa Avenue, NW  
Unit 10  
Grand Rapids, MI 49503-2341

RE: Violation Notice, Rule 901(b)

Dear Mr. Grinstern:

As required by the Violation Notices, identified in your letter of September 9, 2016 and Ms. Kaitlyn DeVries' letter dated August 24, 2016, Lowell Energy AD LLC is taking actions to address the items identified in your letter and Ms. DeVries' letter. The actions we are taking should not be construed as an admission that a violation has occurred but we are committed to eliminating detectable odors beyond the boundaries of our site.

The alleged violations based on both letters occurred on August 15, August 16, August 17, August 18, August 22, September 5 and September 7, 2016. In conjunction with the notification and our own ongoing commitment to mitigate the odors, a site assessment and air sampling were conducted on August 31 and September 1, 2016 by Webster Environmental Associates. Webster has been very helpful in identifying the specific odor sources and recommending containment and mitigation solutions. They believe that over 90% of all of detectable odors were coming from our wastewater pretreatment tanks and single roof vent. A failure of the biological processes required to treat wastewater was a major contributor creating twice the rate of odors coming from the roof vent. The containment and mitigation actions are being installed to prevent detectable odor from leaving the site.

As of September 6, we have stopped receiving deliveries of feedstocks, to include fats, oils, greases, manure, beer waste and expired dairy products, until we are able to achieve process stability and implement Webster Environmental's recommendations. We are still processing wastewater from Litehouse, Inc., however, the resulting solids are being removed from the site by licensed haulers. To date, we believe the wastewater pretreatment system has improved substantially. There are lingering odors being emitted from our roof vent pending completion of the work outlined in our plan (see the enclosed, Odor Mitigation Plan, dated September 20, 2016).

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P. O. Box 68073  
Grand Rapids, MI 49516

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Based the recommendations from Webster Environmental, prevention of a recurrence includes the following actions:

1. Follow proper maintenance procedures to include the monitoring of the performance of the media utilized in the VX Carbon Absorber Radial Unit. Replace media as necessary to prevent the emanation of detectable odors.
2. On a daily, weekly and monthly basis monitor and test as necessary the biological performance of the wastewater pretreatment system.
3. Coordinate operating production schedules with Litehouse to ensure stability in the biological process.
4. On a quarterly basis, review and conduct air sampling to ensure compliance.

We look forward to completing the implementation of our plan of action as quickly as possible. Further we are continuing to improve our operations by addressing design and construction issues that have been identified.

We are committed to being a good corporate citizen as we strive to achieve our goal of generating renewable energy in a sustainable and environmentally responsive manner.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Northrup', is written over a light blue horizontal line.

Greg Northrup  
Managing Member

cc: Ms. Kaitlyn DeVries, MDEQ, Grand Rapids District Office