



November 6, 2020

Ms. Michelle Luplow
AQD – Lansing District Office
Michigan Department of Environment, Great Lakes, and Energy
525 W Allegan, First Floor Southwest
Lansing, MI 48909

**Re: Response to Violation Notice
ZFS Ithaca, LLC, SRN P0788**

Dear Ms. Luplow:

ZFS Ithaca, LLC (ZFS Ithaca) respectfully submits this response to a Violation Notice dated October 26, 2020 regarding emission limit exceedances at EUPELLETIZING. The following information should address your concerns regarding the exceedance of Particulate Matter 10 (PM10) and Particulate Matter 2.5 (PM2.5) at the unit.

Dates the Violation Occurred: It was first identified that EUPELLETIZING was exceeding the PM10 and PM2.5 emission limits in the final test report dated September 30, 2020 for compliance testing that took place in July 2020.

Explanation of Causes: This was the first time EUPELLETIZING was tested for compliance since installation and startup in February 2020. The cause of the exceedance is related to the amount of equipment being aspirated by the EUPELLETIZING cyclone. The EUPELLETIZING cyclone is not able to meet the particulate emission limits with the amount of particulate laden airflow being received.

Duration of the Violation: The unit began operation in February 2020. There was no knowledge of this violation until the compliance testing was performed in July 2020.

Summary of Corrective Actions: On September 24, 2020, staff reviewed air flow piping and ductwork that was installed and routed to the EUPELLETIZING cyclone. It was determined that some equipment that was part of the hull grinding process was being aspirated to the EUPELLETIZING cyclone instead of the EUHULLGRINDING baghouse. Staff corrected this by removing the existing ductwork and installing new ductwork that was routed the EUHULLGRINDING baghouse. The piping which was previously connected to the EUPELLETIZING cyclone has been removed. By reducing the amount of fine particulate going to the EUPELLETIZING cyclone, the exit gas should now meet the PM10 and PM2.5 limits.



Steps to Prevent a Reoccurrence: If the air flow adjustments are sufficient to show compliance with the PM10 and PM2.5 limits, no additional action will be necessary to prevent a reoccurrence. The unit is scheduled to be stack tested again the week of November 9, 2020.

Additional Requests: The NOV states that there are adjustments being made to the exhaust of EUPELLETIZING cyclone. This statement is not correct, as there are no alterations being made to the exhaust stream coming off of the EUPELLETIZING cyclone. The piping for some hull grinding equipment previously connected to the inlet of the EUPELLETIZING cyclone has been removed. There are no operating parameters to monitor other than viewing the physical change to the process. Because of the nature of the piping change, there is no physical way to reroute the air flow back to the EUPELLETIZING cyclone.

If you have any questions, please contact me by phone at 616-879-1711 or by email at bridgetter@zfsinc.com.

Sincerely,

A handwritten signature in black ink that reads "Bridgette L. Rillema". The signature is written in a cursive style with a large, prominent "B" and "R".

ZFS Ithaca, LLC
Bridgette L. Rillema, P.E.
Environmental Manager

cc: Ms. Jenine Camilleri, EGLE