



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 22, 2020

Ms. Bridgette Rillema, Environmental Manager
ZFS Ithaca, LLC
2525 84th Avenue
Zeeland, Michigan 49464

SRN: P0788, Gratiot County

Dear Ms. Rillema:

VIOLATION NOTICE

On August 26, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received ZFS Ithaca's stack test report dated August 18, 2020, for stack testing conducted June 9 through June 11, 2020, on EUDRYING1, EUSHIPRECEIVE, and EUHANDLING at ZFS Ithaca located at 1266 E. Washington Street, Ithaca, Michigan. The purpose of the stack test was to determine ZFS Ithaca'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 Permit to Install (PTI) number 20-17B.

The stack test report indicated the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUDRYING1	PTI 20-17B, SC I.6; R 336.1205(1)(a), 40 CFR 52.21 (c) & (d)	Carbon monoxide (CO) limit of 5.54 lb/hr exceeded at 5.85 lb/hr

The test report received on August 26, 2020, indicated that EUDRYING1 exceeded the 5.54 lb/hr CO limit at 5.85 lb/hr.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 13, 2020, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

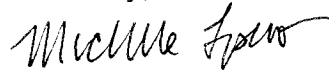
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Please submit the written response to EGLE, AQD, Lansing District, at Constitution Hall, Lansing District Office, First Floor South, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. Please also submit an email copy of the written response to Michelle Luplow at luplowm1@michigan.gov.

If ZFS Ithaca, 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 violation cited above and for the cooperation that was extended to me during my inspection of ZFS Ithaca, LLC. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-294-9294

cc: Mr. Scott Duncan, ZFS Ithaca LLC
Mr. Brandon LaRosa, Zeeland Farm Services
Ms. Bridgette Rillema, Zeeland Farm Services
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Brad Myott, EGLE