



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 26, 2020

Ms. Bridgette Rillema, Environmental Engineer
Zeeland Farm Services, Inc.
2525 84th Avenue
Zeeland, Michigan 49464

SRN: P0788, Gratiot County

Dear Ms. Rillema:

VIOLATION NOTICE

On October 8, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received ZFS Ithaca's stack test report dated September 30, 2020, for stack testing conducted July 28 through July 30, 2020, on EULOADOUT, EUPREP, EUDC, EUEXTRACTION, EUMEALGRINDING, and EUPELLETIZING at ZFS Ithaca located at 1266 E. Washington Street, Ithaca, Michigan. The purpose of this 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
EUPELLETIZING	PTI 20-17B, SC I.3, R 336.1205(1), 40 CFR 52.21 (c) and (d)	Particulate Matter 10 (PM ₁₀) limit of 0.80 pph exceeded at 1.03 pph.
EUPELLETIZING	PTI 20-17B, SC I.4, R 336.1205(1), 40 CFR 52.21 (c) and (d)	Particulate Matter 2.5 (PM _{2.5}) limit of 0.80 pph exceeded at 1.03 pph.

The allowed maximum emission rate of PM₁₀ and PM_{2.5} on EUPELLETIZING is 0.80 pounds per hour. Actual emissions in the test report received on October 8, 2020, were reported at 1.03 pounds per hour for both PM₁₀ and PM_{2.5}.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 16, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the 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

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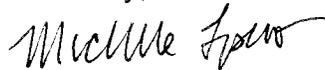
taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. Additionally, please also include an explanation of the adjustments made to the exhaust stream on EUPELLETTIZING; the impact the adjustments will have on PM₁₀ and PM_{2.5} emissions; and, if applicable, how these adjustments will be monitored during the retest and in the future to ensure that the operating parameters during the retest will be maintained going forward.

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 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 ZFS Ithaca. 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,



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

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Brad Myott, EGLE