



October 2, 2019

Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division – Grand Rapid District
350 Ottawa Avenue NW
Unit 10
Grand Rapids, MI 49503



Re: Wilbur-Ellis Agribusiness, SRN: U621903862, Response to Notice of Violation

Dear Air Quality Division – Grand Rapids District:

On behalf of Wilbur Ellis, thank you for the opportunity to assess and respond to the Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division – Grand Rapid District inspection findings brought to the attention of Wilbur-Ellis Agribusiness.

The Facility located at 277 South Maple St, Grant, Michigan was constructed in the late 1960s. The Facility operations that occur today are consistent with the Facility operations that occurred when the Facility was originally constructed.

The Facility operates a Dry Fertilizer Storage and Distribution Process that includes the use of two fertilizer blenders which mix different types of dry fertilizers together, and associated load-in and load-out process equipment. The Dry Fertilizer Storage and Distribution Process operations are dependent on weather, customer demand, and agricultural seasons (i.e. September – October and May – July). During the off-seasons (i.e. winter and early spring months) the Dry Fertilizer Storage and Distribution Process does not operate.

RME has been retained by Wilbur-Ellis Agribusiness to prepare an application for a PTI in order to achieve compliance with Rule 201. RME has extensive experience in the permitting of fertilizer blending and distribution facilities across the US. The PTI application will be submitted to the Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division – Grand Rapid District no later than November 4, 2019.

Please let me know if you have any questions regarding the details provided. I can be contacted 972-272-0386 or at daweeks@rmese.com.

Sincerely,
RME Safety and Environmental, LLC.

A handwritten signature in black ink that reads 'David A. Weeks'. The signature is written in a cursive style and is positioned above a horizontal line.

David A. Weeks, P.E., BCEE, CIH
Senior Engineer
RME Safety and Environmental, LLC
3300 North Glade Road
Pasco, WA 99301