



May 29, 2014

April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
Michigan Department of Environmental Quality
Grand Rapids District Office
350 Ottawa NW, Unit 10
Grand Rapids, Michigan 49503-2341

Subject:

Response to Violation Notice Dated April 14, 2014

Reference:

Michigan Turkey Producers CO₇OP Inc.

ASSOCIATION OF WAR IN COMMENT

2140 Chicago Drive SW Wyoming, Michigan 49519 SRN B8704 – Kent County

Dear Ms. Lazzaro:

Please find described herein the actions that Michigan Turkey Producers CO-OP Inc. (MTP) plans to take to address the subject Violation Notice (VN) regarding the installation of the Caterpillar natural gas fired co-generation engine sets.

1. MTP will prepare a facility wide Potential to Emit (PTE) demonstration that will include but not be limited to the natural gas fired co-generation engine sets, and the natural gas fired emergency generator sets.

The PTE demonstration will include all combustion units located at the facility, and will include the carbon dioxide (CO₂) storage tank and CO₂ pellets in the GHG portion of the PTE demonstration. The complete PTE demonstration will be submitted to the DEQ no later than June 6, 2014.

2. MTP will prepare an application for a facility wide air permit.

MTP will prepare an application for a Rule 201 Permit to Install (PTI) that will Michigan Turkey Producers * 1100 Hall Street SW * Grand Rapids, MI 49503

include the natural gas fired cogeneration units, emergency generator units, and CO_2 gas and pellets. If appropriate, the PTI application will include a request for federally enforceable fuel usage and emissions limitations in order to establish the facility as a synthetic minor source. The PTI application will be prepared and submitted to the DEQ no later than June 27, 2014.

3. Conversion or Removal of the Natural Gas Fired Co-Generation Engine Sets

MTP is considering the conversion of the natural gas fired co-generation engine sets to emergency generation duty only, or the decommissioning and removal of the units from the facility. These units have had very limited use over the past couple of years, and it may not be economically feasible continuing to maintain them for peak shaving purposes going forward. MTP will notify the DEQ of this decision once it is made.

As you requested, Michigan Turkey Producers plans to complete the above tasks in accordance with the schedule described above. Thank you for your assistance in helping us resolve these issues. MTP will work diligently to correct all outstanding issues in a timely fashion and will strive to ensure ongoing compliance. If you have any questions, please contact me at (616) 245-2221 x-199, or Mark Horne of Environmental Partners at (616) 928-9128.

Sincerely,

MICHIGAN TURKEY PRODUCERS CO-OP INC.

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Michael Hart

Maintenance and Engineering Manager

cc: Mark A. Horne, P.E., Environmental Partners, Inc.