



April 25, 2022  
Project No. 220602

Stephanie Weems  
Jackson District Office  
Air Quality Division  
Michigan Department of Environment, Great Lakes, and Energy  
State Office Building, 4<sup>th</sup> Floor  
301 East Louis Glick Highway  
Jackson, MI 49201-1535

**Response to the Violation Notice Dated April 7, 2022**  
**Crimson Holdings (SRN E8117)**  
**Adrian, Michigan**

Dear Stephanie:

This letter is in response to the EGLE-AQD Violation Notice dated April 7, 2022 (VN). The NV suggests that Crimson Holdings is in violation of its Permit to Install (PTI) 38-06. The allegation cited in the VN is as follows.

Process Description	Rule/Permit Condition Violated	Comments
Stack/vent restrictions	R336.1201(1); PTI 38-06 Special Condition 1.3	Modification of facility stack without an approved permit modification

As requested, this letter provides information regarding the referenced citations, including: the date the alleged violations occurred; an explanation of the causes and duration of the alleged violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations; the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

It should be noted that Crimson Holdings was unaware that the stack was not in conformance with the permit until the notification from the State. The stack was modified a few years ago by the previous owners. Crimson Holdings is currently speaking with the dryer manufacturer who performed the previous stack modifications about changing the stack so that it does discharge unobstructed vertically upwards, ensuring that it meets the minimum height requirements in the permit (25 feet). A crane will be necessary for the construction and installation of the stack and between the redesign and scheduling the work, the stack changes may not be completed until September 1<sup>st</sup>. The stack modification should also help in mitigate odors from the stack.

If the odor persists, we are investigating the use of an odorant for additional control. After discussions with you and Chuku Oje, we understand that before using an odor neutralizer we must document that the activity is exempt, or we must secure a PTI.

We appreciate you taking the time to meet with us on March 24 and now have a better understanding of the PTI requirements and the need to modify the PTI in the event we need to make additional process changes or stack changes at the facility. If you have any questions, please contact me at [dhofbauer@crimsonhldg.com](mailto:dhofbauer@crimsonhldg.com) (517.208.0904) or our environmental consultant, Lillian Woolley with Fishbeck, at [llwoolley@fishbeck.com](mailto:llwoolley@fishbeck.com) (586.489.6876).

Sincerely,



Dan Hofbauer  
Plant Manager

Attachments

By email and UPS

Attachments

Copy: Jenine Camilleri – EGLE-AQD, Lansing  
Chuku Oje – EGLE-AQD, Lansing