



July 26, 2022

Project No. 220602

Scott Miller  
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 Letter Dated July 21, 2022**  
**Crimson Holdings (SRN E8117)**  
**Adrian, Michigan**

Dear Scott:

On July 21, 2022, EGLE-AQD issued a Violation Notice (VN) to Crimson Holdings, LLC alleging a violation of Permit to Install (PTI) 38-06 on Friday, July 15, 2022. The specific allegations cited in the VN are as follows.

| Process Description                 | Rule/Permit Condition Violated | Comments   |
|-------------------------------------|--------------------------------|--|
| Powdered Egg Manufacturing Facility | R 336.1901(b)                  | On July 15, 2022, EGLE-AQD staff followed up on several complaints that were received concerning odors. EGLE-AQD staff were able to verify that these odors were a violation of Rule 901(b). |

As requested, this letter provides information regarding the referenced citation, including: the date the alleged violation(s) occurred; an explanation of the cause(s) and duration of the alleged violation(s); whether the violation(s) is/are ongoing; a summary of the action(s) that have been taken and are proposed to be taken to correct the violation(s); the date(s) by which these action(s) will take place; and what steps are being taken to prevent a reoccurrence.

### **Rule 901(b) Corrective Actions**

Since May 27, 2022, Crimson Holdings has installed and operated an odor neutralizer system, which has made a considerable improvement in reducing odors from facility. Unfortunately, it has been hard to procure the odor neutralizer chemicals. By July 15, 2022, the facility had nearly run out of chemicals and was injecting the odor neutralizer at a reduced rate. We currently have two extra drums of the odor neutralizer and are working to keep a small stockpile on hand to ensure we do not run out.



In addition, restoring the stack configuration to exhaust *unobstructed, vertically upwards* will improve dispersion south of the plant approximately 80% as previously indicated by air dispersion modeling. We believe that the stack replacement will ensure that the odors have been permanently mitigated. While we may continue to use the odor neutralizer, the largest benefit is expected from the new stack. The new stack should be installed and operational on Friday, July 29, 2022. It should be noted that changes were made to the stack by its previous owner, Dairy Farmers of America.

Additional action items that have been completed include:

- The exhaust fan from the area of the plant housing the dissolved air flotation (DAF) system associated with the wastewater treatment plant (WWTP) has been equipped with a carbon filter.
- Sludge is more frequently removed from the WWTP. Allowing the sludge to remain in the tank for an extended period of time may have lead to additional odors from the sludge tank.
- The casing for the sludge tank carbon filter was replaced and a new stack was installed on the sludge storage tank.
- Staff have had additional training regarding checking incoming loads for odors and other issues which could potentially affect the quality of our product. This should also help reduce odors in the plant and outdoors.
- Stack testing has been performed though we are still waiting for amine results from the laboratory. A final report will be submitted once all the laboratory results have been received.
- A Nuisance Odor Management Plan was submitted to EGLE as well as to the Michigan Department of Agriculture and Rural Development (MDARD).
- We will continue to monitor our web-based company complaint form and interact with complainants to answer questions about the facility and odor minimization activities.

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, of Fishbeck, at [lwoolley@fishbeck.com](mailto:lwoolley@fishbeck.com) (586.489.6876).

Sincerely,

A handwritten signature in black ink that reads "Dan Hofbauer".

**Dan Hofbauer**  
Plant Manager

By email

Copy: Jeff Rathbun – EGLE-AQD  
Stephanie Weems – EGLE-AQD  
Susan Johnson – Butzel Long  
Emily Bur – LS2  
Lillian L. Woolley, PE – Fishbeck