



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

April 7, 2022

VIA EMAIL AND CERTIFIED MAIL

Mr. Dan Hofbauer
Crimson Holdings
1336 East Maumee Street
Adrian, MI 49221

SRN: E8117, Lenawee County

Dear Mr. Hofbauer:

VIOLATION NOTICE

On March 24, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Crimson Holdings located at 1336 East Maumee Street, Adrian, Michigan. The purpose of this inspection was to determine Crimson Holdings 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; the conditions of Permit to Install (PTI) number 38-06; and to investigate a recent complaint which we received on March 11, 2022, regarding foul odors attributed to Crimson Holdings' operations.

During the inspection, staff observed the following:

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

During this inspection, it was noted that Crimson Holdings had commenced operation of unpermitted equipment at this facility. The AQD staff advised Crimson Holdings on March 24, 2022, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the stack/vent restriction process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited Violation and submit a written response to this Violation Notice by (April 28, 2022, which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the Violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the

Mr. Dan Hofbauer
Crimson Holdings
April 7, 2022
Page 2


violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Jackson District, at 301 East Louis Glick Highway, Jackson, Michigan 49201 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Crimson Holdings 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 violation cited above and for the cooperation that was extended to me during my inspection of Crimson Holdings. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Ms. Stephanie Weems
Environmental Quality Analyst
Air Quality Division
517-416-3351

cc: Ms. Margaret McGill, Crimson Holdings
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Scott Miller, EGLE