



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 26, 2022

VIA CERTIFIED MAIL AND EMAIL

Dan Hofbauer
Crimson Holdings, LLC
1336 East Maumee
Street Adrian, Michigan
44333

SRN: E8117, Lenawee County

Dear Dan Hofbauer:

VIOLATION NOTICE

On May 23, 24 & 25, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted complaint investigations of Crimson Holdings, LLC, (Company) located at 1336 E. Maumee St., Adrian, Michigan. The purpose of these investigations were to determine the Company's 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; and to investigate recent complaints which we received on May 23 & 24 2022, regarding foul odors attributed to the Company.

During the investigations, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Powdered egg manufacturing facility	R 336.1901(b)	On May 23, 24 & 25, 2022, AQD staff followed up on several complaints that were received concerning odors (and potential health effects) coming from this facility and were able to verify that these odors were a violation of Rule 901(b).
Powdered egg manufacturing facility.	R 336.1201	The change from milk to powdered egg production has resulted in a meaningful change in air emissions. No permit modification has been received for Permit to Install (PTI) 38-06.

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In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency and duration so as to constitute a violation of Rule 901(b) of the administrative rules promulgated under Act 451.

On May 23, 2022, around 3:00 pm, AQD staff detected odors in a residential area near the company up to 0.1 miles downwind of the facility. The winds were out the east-northeast at approximately 10 mph. The odors were impacting residents and some commercial businesses. The odors that were smelled at this time would be best described as foul and offensive.

On May 24, 2022, at 8:00 am, AQD staff detected an odor plume which extended at least 0.4 miles downwind of the facility and was impacting several residential homes to the western side of it. Several commercial businesses were also being affected at this time. The winds were out of the northeast at approximately 5 mph. The odors that were smelled were described as exceptionally foul odors and appeared to be of the amine variety from the biological breakdown of proteins.

On May 25, 2022, at 7:00 am, AQD staff detected an odor plume which extended at least 0.25 miles downwind of the facility and was again impacting several residential homes and commercial business just west of the facility. The wind was out of east at approximately 8 mph. The odors were also foul although a sour smell was also noted suggesting possible lactic acid formation from bacterial breakdown of the eggs.

The AQD is requesting that the Company take prompt action to address the odor issue. Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice within **7** calendar days of the date of this letter. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the 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 and the dates by which these actions will take place; and what steps are being taken to prevent a re-occurrence.

Furthermore, it is requested that the Company take steps to immediately characterize/estimate the types and amounts of any odorous or potential toxic chemical compounds being emitted by this facility. A report containing this information should then be provided to the AQD as soon as possible. Please contact the AQD to discuss this matter further.

Please submit the written response to EGLE, AQD, Jackson District, at 301 East Louis Glick Highway, Jackson, Michigan 49201-1556 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Crimson Holdings, LLC 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.

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Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact Stephanie Weems at 517-416-3351, or me at the number listed below.

Sincerely,



Scott Miller
Jackson District Supervisor
Air Quality Division
517-416-5992

cc:

Kasee Johnson, Lenawee County Health Department
Andrea Keatley, DHHS
Jacob Carrick, DHHS
Brian Kelly, EPA
Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Brian Carley, EGLE
Stephanie Weems, EGLE
Mike Kovalchick, EGLE