



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

April 7, 2023

VIA EMAIL ONLY

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

SRN: E8117, Lenawee County

Dear Dan Hofbauer:

VIOLATION NOTICE

On April 4, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an odor observation in the vicinity of Crimson Holdings, LLC, (Crimson Holdings) located at 1336 East Maumee, Adrian, Michigan. The purpose of this odor observation was to investigate ongoing complaints which AQD continues to receive regarding foul odors attributed to Crimson Holdings' operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Powdered egg manufacturing facility	R 336.1901(b)	On April 4, 2023, AQD staff followed up on ongoing complaints that were received concerning odors coming from this facility. AQD staff verified that these odors were in violation of Rule 901(b).

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. The AQD staff detected odors in a residential area near the company up to 0.3 miles downwind. These odors were impacting residents and nearby commercial businesses.

Furthermore, on March 28, 2023, AQD staff issued a Violation Notice to Crimson Holdings for emitting odors in violation of Rule 901(b). AQD received Crimson Holding's response on March 31, 2023. Upon review, AQD has determined that the response did not adequately address the cited violation or include sufficient corrective actions to resolve past violations and prevent future Rule 901(b) violations. Previous violations cited on April 7, 2022, May 26, 2022, July 21, 2022, November 1, 2022, and March 28, 2023, remain unresolved and ongoing. Additionally, the actions Crimson Holdings has taken to date to control facility odors are not sufficient.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 21, 2023, (which coincides with 14 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an

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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 reoccurrence. In the response, generally acceptable engineering solutions already examined by the company should be re-examined. Explanations of the engineering reasons the company is either considering or rejecting them should be included in the response. Expedient timelines for implementing proposed corrective actions should be presented.

Please submit the written response to EGLE, AQD, Jackson District, at 301 East Louis Glick Highway, Jackson, Michigan 49201 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.

Thank you for your attention to resolving the violation cited above. 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,



Scott Miller
Jackson District Supervisor
Air Quality Division
517-416-3351

cc: Greg Elliot, City of Adrian
John Gillooly, Garan Luow Miller P.C.
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Stephanie Weems, EGLE