



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

March 12, 2024

VIA EMAIL ONLY

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

SRN: E8117, Lenawee County

Dear Dan Hofbauer:

VIOLATION NOTICE

On March 7, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Crimson Holdings, LLC located at 1336 E. Maumee Street, Adrian, Michigan. The purpose of this inspection was to determine Crimson Holdings, LLC's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resource and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; the conditions of Permit to Install (PTI) 38-06A; and Consent Order AQD number 2024-01. During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-SPRAY-DRYER Egg spray drying operation	R 336.1901(b) Consent Order AQD No. 2024-01 Section 9	Odor associated with facility observed in surrounding area and coming from scrubber exhaust. AQD staff verified these odors were in violation of Rule 901(b).

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

The AQD staff detected these odors in a residential area near the company and verified these odors were coming from Crimson Holdings' scrubber exhaust stack. Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 21, 2024, (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

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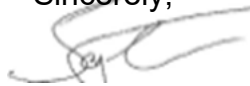
proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Additionally, AQD requests that Crimson Holdings, LLC, identify how their corrective action plan might alter any terms under the Nuisance Odor Management Plan as required under PTI 38-06A and Consent Order AQD No. 2024-01. This should also include what the current operating parameters are for the scrubber and what they will be in response to this Rule 901(b) Violation.

Furthermore, when the updated Nuisance Odor Management Plan is submitted to AQD, we request that the title of the document be changed to "Nuisance Minimization Plan for Odors" and that the complaint link included in Section 5.2 be updated to include a working link or to remove the reference to the link.

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
517-416-5992

cc: Greg Elliott, City of Adrian
Burke Castlebury, Castlebury, Lucas, P.A.
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Brian Merle, EGLE