



Zeeland Farm Services, Inc.®

4
April 23, 2013

Ms. April Lazzaro
MDEQ – Air Quality Division
Grand Rapids District Office
State Office Building, 5th Floor
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2341
lazzaroa@michigan.gov



Re: Response to April 3, 2014 Violation Notice
ROP: MI-ROP-M4204-2012a
Zeeland Farm Services, Inc. (SRN: M4204)

Dear Ms. Lazzaro:

Zeeland Farm Services, Inc. (ZFS) timely submits this written response to the Air Quality Division's (AQD's) April 3, 2014 Violation Notice (VN). Specifically, this letter addresses each of the VN's allegations and provides corrective actions that will be implemented.

EUPREPEQUIPMENT (MI-ROP-M4204-2012a, Special Condition VI.2; 40 CFR 64.6(c)(1)(iii))

ZFS previously reported that the pressure drop across the baghouse was not recorded on July 31, 2013 from 8AM to 9AM and on August 7, 2013 at 8AM. Upon further review of additional operational records, it was identified that the plant was down and not operating from 8AM to 9AM on July 31, 2013 and at 8AM on August 7, 2013. Therefore, no pressure drop readings could be obtained or recorded for the baghouse at these times. ZFS does not view these instances as deviations.

However, ZFS recognizes that documentation of the operational status of equipment could be improved. As such, ZFS has developed new internal air compliance recordkeeping forms. The new forms collect more data, allow staff to provide more accurate information regarding the operational status of equipment, and require a supervisor's review at the end of each day. The new recordkeeping forms will be implemented no later than May 1, 2014.

EUPREPEQUIPMENT (MI-ROP-M4204-2012a, Special Condition VI.5; 40 CFR 64.7(c))

This permit condition simply reiterates the need for continuous monitoring and the requirement to, "...collect data at required intervals..." Please see responses above for EUPREPEQUIPMENT (MI-ROP-M4204-2012a, Special Condition VI.2; 40 CFR 64.6(c)(1)(iii)).

FGEXTRACTION (MI-ROP-M4204-2012a, Special Condition VI.2)

ZFS previously reported that the sparge deck temperature was not recorded on July 13, 2013 from 8AM to 10AM and July 31, 2013 from 8AM to 9AM. Upon further review of additional operational records, it was identified that the plant was down and not operating from 8AM to 10AM on July 13, 2013 and from 8AM to 9AM on July 31, 2013. Therefore, no sparge deck temperature readings could be obtained or recorded for the baghouse at these times. ZFS does not view these instances as deviations.

The previously reported instance of the sparge deck temperature not recorded on August 23, 2014 at 4PM was staff error. There is no explanation other than it was missed on the hourly rounds.

ZFS recognizes that documentation of the required monitoring and the operational status of equipment could be improved. As such, ZFS has developed new internal air compliance recordkeeping forms. The new forms collect more data, allow staff to provide more accurate information regarding the operational status of equipment, and require a supervisor's review at the end of each day. The new recordkeeping forms will be implemented no later than May 1, 2014.

FGEXTRACTION (MI-ROP-M4204-2012a, Special Condition VI.4)

ZFS previously reported that the LEL measurements from the main gas vent were not recorded the required four (4) times per day on the following dates:

DATE	DESCRIPTION
08/07/14	LEL in the main gas vent was only recorded 3 times during the day
08/26/14	LEL in the main gas vent was only recorded 2 times during the day
09/20/14	LEL in the main gas vent was only recorded 2 times during the day. ZFS does not view this as a deviation because the plant was not operating for a significant portion of the day.
09/22/14	LEL in the main gas vent was only recorded 3 times during the day
12/02/14	LEL in the main gas vent was only recorded 3 times during the day

ZFS staff typically take the measurements at the same time each day. As such, if the equipment is not operating at that time, staff do not take measurements. It is obviously not clear to all staff that measurements can be taken at different times, not only on the normally scheduled rounds.

ZFS believes this is a training and documentation problem. As such, ZFS has developed new internal air compliance recordkeeping forms. The new forms collect more data, allow staff to provide more accurate information regarding the operational status of equipment, and require a supervisor's review at the end of each day. Additionally, upon implementation of the new recordkeeping forms, all staff will be trained on data collection and use of the new forms. The new recordkeeping forms will be implemented no later than May 1, 2014.

Ms. April Lazzaro
MDEQ – AQD
April 24, 2014
Page 3

ZFS stands by its approach at attempting to collect measurements at evenly spaced intervals throughout the day. Therefore, if the equipment is not operating for a significant period of time during the day, not all four (4) measurements may be able to be obtained.

Conclusion

In addition to the new internal air compliance recordkeeping forms, ZFS has prepared an updated Compliance Assurance Monitoring (CAM) Plan per the AQD's request. The updated CAM Plan is included with this submittal.

If you have any questions regarding this submittal, please contact me at 616-879-1711 or bridgetter@zfsinc.com.

Sincerely,

Zeeland Farm Services, Inc.



Bridgette L. Rillema, P.E.
Environmental Manager

Enclosure CAM Plan dated April 21, 2014

cc: Ms. Heidi Hollenbach, DEQ (via email)
 Ms. Lynn Fiedler, DEQ (via email)
 Ms. Teresa Seidel, DEQ (via email)
 Mr. Thomas Hess, DEQ (via email)
 Mr. Eric Meeuwsen, ZFS
 Mr. Cory Lopshire, ZFS