



October 12, 2020

Ms. Michelle Luplow
AQD – Lansing District Office
Michigan Department of Environment, Great Lakes, and Energy
525 W Allegan, First Floor Southwest
Lansing, MI 48909

**Re: Response to Violation Notice
ZFS Ithaca, LLC, SRN P0788**

Dear Ms. Luplow:

ZFS Ithaca, LLC (ZFS Ithaca) respectfully submits this response to a Violation Notice dated September 22, 2020 regarding emission limit exceedances at EUDRYING1. The following information should address your concerns regarding the exceedance of carbon monoxide (CO) at the unit.

Dates the Violation Occurred: It was first identified that EUDRYING1 was exceeding the CO emission limit in final test report submitted August 24, 2020 for compliance testing that took place in June 2020.

Explanation of Causes: This was the first time EUDRYING1 was tested for compliance since installation in 2019. After discussions with the manufacturer, ZFS Ithaca believes that adjustments are necessary to the burner supplying heat to the unit.

Duration of the Violation: The dryer unit began operation in October 2019. There was no knowledge of this violation until the compliance testing results were received on August 24, 2020 for testing that was performed in June 2020.

Summary of Corrective Actions: To date, ZFS Ithaca has been working with the manufacturer of the unit to determine a corrective action. At this time, it is believed that adjustments to the burner may reduce CO emissions. The manufacturer of the dryer is located in Canada and they do not have a service representative in the United States. Due to the ongoing pandemic, they are unwilling to send anyone into the United States at this time because of quarantine restrictions. As such, ZFS Ithaca is attempting to perform the adjustments necessary to the burner in October 2020. Retesting of the unit for compliance will be conducted in November 2020 to determine if the adjustments to the burner were sufficient.



Steps to Prevent a Reoccurrence: If the burner adjustments were sufficient to show compliance with the CO limits, no additional action will be necessary to prevent a reoccurrence.

If you have any questions, please contact me by phone at 616-293-8150 or by email at bridgetter@zfsinc.com.

Sincerely,

Bridgette L. Rillema

ZFS Ithaca, LLC
Bridgette L. Rillema, P.E.
Environmental Manager

cc: Ms. Jenine Camilleri, EGLE