



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

March 30, 2023

VIA EMAIL ONLY

Jeff Laverty, Factory Manager
Quality Roasting, LLC
135 South Bradleyville Road
Reese, Michigan 48757

SRN: P1000, Tuscola County

Dear Jeff Laverty:

VIOLATION NOTICE

On February 14, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), was informed by an authorized representative of Quality Roasting, LLC that unpermitted equipment had been installed at the facility located at 135 South Bradleyville Road, Reese, Michigan. Subsequent review of the situation, and data provided later, found violations of air use Permit to Install (PTI) number 61-20A.

The review indicates the following violations:

Process Description	Rule/Permit Condition Violated	Comments
Soybean Roaster	R 336.1201(1)	Installed an Eagle 4 roaster without permit
EUMEALCOOLER cyclone & stack	R 336.1201(1)	Installed a second cyclone, fan, and stack
Meal Loadout Silos	R 336.1201(1)	Installed 10 silo loadout operation without permit
FG-PROCESS (soybeans)	FG-PROCESS Special Condition (SC) II.1	Exceeded throughput limit: 171 Mill # or more since June 2022 vs limit of 156 Mill # per year.
FG-PROCESS (soybean oil)	FG-PROCESS SC II.2	Exceeded throughput limit: 19.59 Mill # or more since May 2022 vs limit of 18.72 Mill # per year
FG-PROCESS (soybeans)	FG-PROCESS SC VI.1	12 month rolling time period records not kept
FG-PROCESS (soybean oil)	FG-PROCESS SC VI.1	12 month rolling time period records not kept
FG-STORAGE	FG-STORAGE SC VI.1	Visible emissions records not kept
FG-DUST	FG-DUST SC VI.2 and 3	Fugitive dust plan records not kept.

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Quality Roasting, LLC installed a second, larger roaster without obtaining a PTI. The roaster is a source of air contaminants. A fourth press was added to the total of three when the facility was initially permitted. Though the press itself is not a known source of air pollutants, its incorporation, along with the new roaster, debottlenecked the process that was permitted by PTI No. 61-20A. A second cyclone and stack were added to the meal cooler to dissipate heat from additional throughput. Lastly, a 10-silo meal loadout was being constructed to handle increased production. The lack of obtaining a PTI prior to installation of the roaster, meal loadout, and control equipment / stack to the meal cooler, results in a violation of Rule 201 of the administrative rules promulgated under Act 451. It is the AQD's understanding that Quality Roasting, LLC will be applying to modify PTI No. 61-20A, after results from engineering stack testing, conducted in early March of 2023, are obtained.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 20, 2023 (which coincides with 21 calendar days from 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 reoccurrence.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Quality Roasting, 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 violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Ben Witkopp
Environmental Engineer
Air Quality Division
989-295-1612

cc: Scott Rabe, Quality Roasting
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Chris Hare, EGLE