

From: [Bob Kennedy](#)
To: [Witkopp, Ben \(EGLE\)](#); [Irwin, Andrea \(EGLE\)](#)
Cc: [Switzer, Annette \(EGLE\)](#); [Ethridge, Christopher \(EGLE\)](#); [Myott, Brad \(EGLE\)](#); [Camilleri, Jenine \(EGLE\)](#); [Hare, Chris \(EGLE\)](#); [Patrick Nellenbach](#); [Kim Brookens](#); [Bob Kennedy](#)
Subject: Star of West/Shepherd Corn Pile
Date: Tuesday, April 16, 2024 5:16:01 PM
Attachments: [U372308129_VN_20240326.pdf](#)

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Hello Mr. Witkopp & all,

My name is Bob Kennedy, and I am a V.P. for Star of the West Milling Company overseeing the Central Michigan Region; which includes our Shepherd location.

Patrick Nellenbach (Star environmental and safety Director), and our Shepherd Manager have been filling us in on the grain pile issue, and we have been debating some type of solution to this challenge of picking up the rest of our corn pile (80% done currently), and the future of the Shepherd Elevator as it pertains to this issue.

Please let this e-mail serve as a response to your violation attached, that was due by today.

To start:

As you may or may not be aware, Star of the West just purchased this location 2 years ago from Brown Milling.

Since the purchase we have been following standard grain pile practices of Brown Milling concerning the grain pile, as the previous owner was building this pile and picking it up in the spring for the past 16 years.

During this time, and during the past 2 years Star has owned this location; there were no complaints from the city, community, or State of Michigan.

It led us to believe that continuing to build a pile was not a problem, and last fall we built this grain pile in good faith; to let farmers in the Region continue their fall harvests before winter.

As an FYI logistics/shipping is a problem during harvest for the Michigan Grain Industry, thus the need for a grain pile in Shepherd; and the many other grain piles all over Michigan.

The grain pile in Shepherd is a two-fold issue, as it is both a short-term and long-term issue, and not a simple fix. We will attempt to lay out both the short-term and long-term issues in the following note.

- 1. Short -Term: We need to pick up the rest of the corn pile in Shepherd, as there is roughly \$1,000,000 dollars of corn setting on the ground that will rot in the not to distance future.**

Options:

A. Our #1 thought is to pick up the rest of the pile when the wind is correct, and not blowing into town; while being extremely wind focused as we pick up the pile with a loader into trucks. (standard past practice)

- It looks like a south/southerly wind would take any dust onto our parking lot which is close to 900 feet long, thus covering the distance you reference in the letter you sent. It also goes directly towards our elevator across the road.
- It also looks like a North wind also could take potential grain dust into the woods, and would have minimal if any impact.

We feel this the best option at this point in time, and we could pick up the remaining grain pile in roughly 2-3 working days; and start to work on a long term solution.

B. The second thought is shipping in a grain auger machine that plunges into the pile, goes through augers, and shoots into the semi truck. It is a slower process, it will still emit some dust as it goes into the truck, and will probably take us 5-6 days to pick up the remaining pile.

Proposed Short-Term Solution:

We would propose to pick up the rest of the pile that is on the ground by going with plan A above, monitoring the wind direction and weather, stopping pick up of pile if there is a major wind shift, and not resume pick up until wind shifted back to a southerly or north wind.

If this is not sufficient, we would try the other concept mentioned in B above; with the auger machine.

2. Long-Term Solution - Discovering realistic options on building a pile in the future, or alternative solution.

As mentioned above, the reason we build a corn pile in Shepherd is to enable the farmers to harvest their crops in the fall to overcome logistics delays experienced during harvest in Michigan.

We are very concerned that if this pile is a continual issue, or if we are unable to utilize a grain pile in Shepherd, that we will need some major investments in this facility if we continue to handle corn for the area farmers.

We have explored multiple idea's the last month on how to accomplish running Shepherd with no pile, and it is very evident to us between slow equipment supply chains, engineering and design's, permits, contractors, and costs that there is not enough time for us to complete these things by the coming harvest in October of 2024.

This research has also brought to reality that this type of major infrastructure investment (\$4-5 million) may be a very big risk for our company if we continue to have the issues with the City and State comparable to the corn pile situation.

The regional farm community counts on this Grain Elevator to handle in bound harvest, and it would be detrimental to the farm community if we could not take their harvest bushels timely; so we certainly are looking for a solution that works for all of us.

With all this said, the situation is more than a letter on how we will handle this going forward in the future.

In light of the seriousness and effects it could have on the region and our company, we are asking for a face to face sit down with the Director of the Air Quality

Division; yourself and any others you desire at this meeting to lay out the situation, ramifications, and long-term possible solutions.

We would be more than happy to come to Constitution Hall to meet and discuss in the very near future.

The Shepherd grain pile is very important to the regional farmers, and grain piles in general are important to Michigan Agriculture; and we feel it is certainly a worthwhile discussion on solutions.

Please give us direction as soon as possible on the current pile, and we look forward to hearing from you on your thoughts on a long-term solution.

Sincerely,

Bob Kennedy

VP Central Michigan
Star of the West Milling Company
Cell = 989-233-6005

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