



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

July 11, 2018

Mr. Mike Irmen
The Andersons, Inc.
P.O. Box 119
Maumee, Ohio 43537

SRN: B8570, Calhoun County

Dear Mr. Irmen:

VIOLATION NOTICE

On June 26, 2018, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), conducted an inspection of The Andersons' Albion Ethanol Plant (Facility), located at 26250 B Drive North, Albion, Michigan. The purpose of this inspection was to determine the Facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) No. 144-15C and Renewable Operating Permit (ROP) number MI-ROP-B8570-2015a.

Based on the inspection and records provided following the inspection, staff of the MDEQ, AQD, noted the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EU-GRAINRECEIVE	MI-ROP-B8570-2015a, Condition II.1	Grain received material limit is 34 million bushels per 12-month rolling time period. Per Facility records, material limit exceeded November 2017 through May 2018. Highest reported value was 46,089,478 bushels (~136% of limit) in March 2018.
FGCORNHAND	MI-ROP-B8570-2015a, Condition VI.4; PTI No. 144-15C, Condition VI.3	Pressure differential gauge required to be calibrated once per year. Documentation that pressure differential gauge is calibrated or replaced on an annual basis was not available.
EU-LOADOUT	MI-ROP-B8570-2015a, Condition VI.3; PTI No. 144-15C, Condition VI.3	See pressure gauge calibration comments above.

FGMILL	MI-ROP-B8570-2015a, Condition VI.4; PTI No. 144-15C, Condition VI.3	See pressure gauge calibration comments above.
FGMILL2	PTI No. 144-15C, Condition VI.3	See pressure gauge calibration comments above.
FGFERM	MI-ROP-B8570-2015a, Condition VI.3; PTI No. 144-15C, Condition VI.3	The permittee shall perform a monthly zero check and configuration check on the scrubber C-40 liquid flow rate monitor. Documentation that monthly zero and configuration checks of the liquid flow rate monitor were being performed and recorded was not available.
FGFERM	MI-ROP-B8570-2015a, Condition VI.4; PTI No. 144-15C, Condition VI.4	The permittee shall inspect the scrubber C-40 liquid level sensor on a weekly basis. Documentation that weekly inspection of liquid level sensor was being performed and recorded was not available.
FGOXID2	PTI No. 144-15C, Condition No. VI.2 and VI.4	The permittee shall conduct and record monthly one minute visible emission observations of the thermal oxidizer C-10A vent. Facility stated observations were done on a daily basis, but no daily or monthly documentation records were available.
FGOXID2	PTI No. 144-15C, Condition VI.1	Regenerative thermal oxidizer (RTO) C-10A operation was verified through general contractor ICM prior to March 2017 expansion plant startup. Condition VI.1 requires that temperature monitoring device shall be calibrated once per calendar year. Documentation that RTO temperature thermocouple is calibrated or replaced on an annual basis was not located.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 1, 2018 (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: MDEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009. Also submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, MDEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Facility 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 and for the cooperation that was extended to me during my inspection of the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Rex I. Lane
Senior Environmental Quality Analyst
Air Quality Division
269-567-3547

RIL:CF

Enclosure

cc: Mr. Evan Dankert, The Andersons
Ms. Mary Ann Dolehanty, MDEQ
Mr. Craig Fitzner, MDEQ
Mr. Christopher Ethridge, MDEQ
Ms. Jenine Camilleri, MDEQ
Ms. Mary Douglas, MDEQ