



POET CARO  
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June 13, 2024

Dillon King  
State of Michigan Department of Environment, Great Lakes, and Energy  
Air Quality Division, Bay City District Office  
401 Ketchum Street, Suite B  
Bay City, MI 48708

Dear Mr. King,

This letter is in response to the NOV received by POET Biorefining – Caro, LLC (POET) from EGLE on May 24, 2024. As requested, POET is providing information related to the cited violation in the letter.

**MI-ROP-N6996-2018a General Condition 43** *Modification of the process producing SO<sub>2</sub> emissions in the process stream.*

#### **Cause and Background**

POET began using a processing aid in October, 2018 to mitigate Deoxynivalenol (DON), a mycotoxin found in corn. The processing aid is added into the syrup tank, which is then pumped into the DDGS Dryers. At that time, POET's initial engineering review concluded that the processing aid did not substantially change the emissions profile at the plant. However, POET added sulfur emissions to the facility's Potential to Emit calculations for the Syrup Tank (EUSYRUPTANK) based on potential sulfur compounds in the tank's vapor space.

In April 2024, engineering stack testing identified that the use of the processing aid results in sulfur dioxide (SO<sub>2</sub>) emission levels that exceed the thresholds that require air permit modifications. POET's current Renewable Operating Permit (ROP) does not include permitting authority for the emission of SO<sub>2</sub>. Upon completion of the April 2024 engineering stack test, POET ceased the use of the processing aid and immediately informed EGLE of the nature and significance of the excess emissions.

#### **Duration and Emissions**

Based on our record of operations and the engineering test results, the duration of DON mitigation activities and associated SO<sub>2</sub> estimated emissions are presented in the table below.

Year	Duration (Days)	SO <sub>2</sub> Emissions (tons/year)
2018	66	38.4
2019	164	95.5
2020	19	11.1
2023	1	0.6
2024	95	55.3
Total	345	201

**Corrective Action**

The violation is not ongoing. Upon completing the engineering stack test in April 2024, the use of the processing aid was stopped. POET submitted an air permit application to EGLE on May 21, 2024, requesting a permit modification to authorize the use of the processing aid. If necessary, POET will amend previous Annual Emission Reports as directed by EGLE. Pending an invoice from EGLE, POET will pay the appropriate emission fees for the previously unreported SO<sub>2</sub> emissions.

If you need additional information or have questions, please feel free to contact David Westlund at 605-965-4962 or [David.Westlund@poet.com](mailto:David.Westlund@poet.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Deland", with a long horizontal flourish extending to the right.

Doug Deland  
General Manager  
POET Biorefining - Caro