

*Via E-Mail*

July 16, 2014

Dale Turton  
Senior Environmental Engineer  
Michigan Department of Environmental Quality  
Air Quality Division  
Kalamazoo District Office  
7953 Adobe Road  
Kalamazoo, MI 49009

***Re: Maroa Farms Violation Notice Dated June 11, 2014***

Dear Mr. Turton:

I am writing on behalf of Maroa Farms, Inc. to your letter dated June 11, 2014. First, thank you for extending the time to respond to your letter until July 16, 2014.

As we discussed by telephone, I have discussed the requirements of 40 C.F.R. Part 60, Subpart Dc (New Source Performance Standards for Small Industrial-Commercial-Institutional Boilers) with Maroa Farms. Accordingly, an Initial Notification and Information form for the two hot water heaters you observed has been submitted to the Kalamazoo District Office via certified mail. Your June 11, 2014 letter was very timely, so this Initial Notification and Information form also includes two additional units that are associated with a new phase of construction that is currently underway. A courtesy copy of the Initial Notification and Information form is included for your reference.

As indicated in your letter, these units are exempt under Mich. Admin. Code r. 336.1282(b)(i) because they are natural gas-fired units that have a rated heat input capacity of not more than 50,000,000 Btu/hour (approximately 37,000,000 Btu/hour).

With respect to the emergency generator, as we discussed by telephone, the specification sheet for the Kohler Model 700REOZDE generator set specifies that the maximum fuel consumption for the generator unit is 51.1 gallons per hour, which means that the unit has a maximum heat input capacity less than 10,000,000 Btu/hour and is exempt under Mich. Admin. Code r. 336.1285(g) as indicated in your e-mail to me on July 8, 2014. Therefore, no permit application is required for the generator set.

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I trust that this letter responds adequately to your June 11, 2014 letter. If you have any questions or concerns, please do not hesitate to contact me.

Once again, thank you for your attention to this matter.

Sincerely,

HONIGMAN MILLER SCHWARTZ AND COHN LLP



S. Lee Johnson

c: Eric Toye, Maroa Farms  
Lynn Fiedler, MDEQ  
Teresa Seidel, MDEQ  
Thomas Hess, MDEQ  
Mary Douglas, MDEQ