



June 24th, 2024

Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-284-9294

Dear Ms. Luplow:

This letter is a response to the Department of Environment, Great Lakes, and Energy (“EGLE”) Violation Notice dated June 14th, 2024, alleging that Neogen Corporation (“Neogen”) is in violation of Michigan Air Pollution Control Rule 201 for construction of a manufacturing facility at 720 East Shiawassee Street without an air permit. Neogen disagrees that it is in violation of Rule 201, because the construction at 720 East Shiawassee Street does not require an air permit.

EGLE indicated that it visited the Neogen site on June 4, 2024; however, we were not aware of this visit and to our knowledge EGLE did not contact Neogen representatives while on-site or before issuing this violation notice to inquire about the construction.

Neogen is building a new manufacturing facility located at 720 E Shiawassee Street to enhance its manufacturing footprint, generating new employment opportunities, and to relocate certain manufacturing operations currently located in several buildings within the city of Lansing. Construction of this facility commenced in October 2022. The processes will be housed in two classes of products that will be manufactured in Lansing in the new facility. One of these products, called Petrifilm, uses two different manufacturing coating application technologies (one water-based and the other solvent-based). The solvent-based product requires the installation of a regenerative thermal oxidizer (“RTO”) and a downstream ethylene oxide (“EtO”) decontamination process.

The building at 720 East Shiawassee will house the coaters that will be used in the manufacturing of Petrifilm using water-based coating products; the solvent-based usage and associated RTO are not currently being constructed. Further, the building that currently is being constructed at 720 East Shiawassee is separate from the building where EtO operations will be performed.

Neogen filed an air permit application in February 2024 for the solvent-based coating usage (with RTO) and EtO process, and we are awaiting approval before we begin construction; Neogen estimates that construction completion will occur by approximately April 2025 (commissioning will follow), subject to permitting and

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construction approvals. We are of the impression that the approval time is within 180 days pursuant to Michigan Air Pollution Control Rule 206(2)

Neogen is aware of and respects the EGLE guidelines, but based on the information and clarification provided above, we do not believe that we are in violation of Rule 201. Accordingly, Neogen denies that the alleged violation is ongoing; Neogen will review the Michigan Air Pollution Control Rules 201 and 278-291 during planning and prior to commencing construction projects and/or changes to its facility pertaining to emissive equipment.

We trust that this clarification clears up that matter and, but if additional clarifications are required or if you would like to meet with us to discuss we can be available at any time.

Sincerely,

Hasan Yamani,
Sr. Director of Capital Projects, Engineering, Facilities
Neogen Corporation
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cc:

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