



AG240  
VN Response to  
VN letter dated 6/2/17



June 8, 2017

Mr. Robert Elmouchi  
Michigan Department of Environmental Quality  
27700 Donald Court  
Warren, Michigan 48092

Subject: Written report to comply with Rule 336.1912.

This letter is on behalf of Cargill, Incorporated ("Cargill") in follow-up to EUPRETZEL PM Emissions Test and to comply with Rule 336.1912 reporting requirements. As required by Rule 336.1912, Cargill's written report shall be submitted within 30 days of discovery of abnormal conditions or malfunction. This report is thus timely as Cargill discovered abnormal conditions or malfunction on May 8, 2017, as described herein.

A PM emissions test was conducted at Cargill's St. Clair Salt facility on the EUPRETZEL 3rd floor dust collector as required by the Permit No. 167-14A. The test was conducted by BT Environmental Consultants on April 12, 2017 and it was witnessed by Tom Maza and Robert Elmouchi from MDEQ.

Cargill received the draft results of the test on May 8, 2017 and reported to MDEQ on May 10, 2017 via email and phone call. Cargill started investigating the issue immediately in order to correct any possible malfunctions and be able to retest as soon as possible.

Since the discovery of the abnormal condition, the facility has taken several actions summarized below:

- Immediately upon receiving the PM results, Cargill checked all operational parameters, which were in compliance.
- Cargill employees conducted visual inspection of the dust collector lines on May 9 and 10 while dust collector was down. No issues that would have been likely to have contributed to the emissions test were identified.
- During dust collector downtime on May 12, Cargill had Karas Plumbing on site to run a camera through the dust collector pipes to identify possible areas with salt buildup. The inspection demonstrated that some of the pipes had some build that warranted further investigation.



- On May 12 while the dust collector was down, Cargill brought two different third party companies, specializing in dust collector system operations, onsite to inspect the dust collector and identify possible issues or opportunities for improvements. Neither ENER-TECH or HDR found any major malfunction.
- On May 18 Cargill took the dust collector down for cleaning for 12 hours. The entire dust collector system was cleaned, including mist eliminator, pipes, and stack.
- On May 19 ENER-TECH was brought back onsite to evaluate the dust collector after the full system cleaning and the results demonstrated that the dust collector continued to be functioning properly.
- BT Environmental Consultants performed an engineering test on the EUPRETZEL dust collector on May 22. Cargill received results on May 31 showing results well below the permissible limit.

In summary, Cargill commissioned two engineering tests that resulted in no findings. The first engineering test occurred prior to the state-witnessed test on March 17. The second engineering test was performed after the entire system had been cleaned on May 22. Each test had results below the permissible limits for all runs performed.

As stated above no significant malfunction was found, and the EUPRETZEL dust collector has been functioning as designed. To the best of Cargill's determination, it appears the results from the state-witnessed test on April 12 was non-representative, and that Cargill Salt was in compliance with the permit.

Cargill is ready to retest the EUPRETZEL dust collector as soon as MDEQ is available to witness the test.

Sincerely,

Priscila Gavel  
EHS Professional  
Cargill Salt St. Clair

CC: Tom Maza, MDEQ  
Karen Kakija-Mills, MDEQ  
John Stuart, CARGILL