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June 23, 2017

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

Subject: Violation Notice, dated June 2, 2017

This letter is on behalf of Cargill, Incorporated ("Cargill") in response to the Violation Notice dated June 2, 2017, and received by Cargill June 5, 2017, in reference to the EUPRETZEL PM Test conducted on April 12, 2017. The NOV requested that Cargill "initiate actions necessary to correct the cited violation and submit a written response ..." This letter describes the actions Cargill has taken to address the cited violation. Cargill looks forward to continuing to work with Michigan Department of Environmental Quality ("MDEQ") to resolve this matter.

#### BACKGROUND

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

On May 8, 2017, Cargill received the draft test results and reported to MDEQ on May 10, 2017 via email and phone call. Of the three tests run, one was well under the applicable limit, but averaging the three runs brought the total over the applicable limit. Cargill was surprised by the results. On March 17, 2017, prior to the state-witnessed test, BT Environmental Consultants performed two 60-minute engineering test runs on EUPRETZEL. These runs resulted in an average of 4.26 lb/hr (4.50 lb/hr and 4.01 lb/hr). This was well under the permissible limit of 5.2 lb/hr and demonstrated that the dust collector was in compliance.



Immediately upon receiving the results of the April 12 test, Cargill started investigating any potential cause of the apparent exceedance of the EUPRETZEL dust collector PM limit. Cargill takes its compliance obligations seriously, and has been working diligently to ensure this issue is resolved and compliance is obtained and maintained going forward.

#### **RESPONSE ACTIONS**

To date, Cargill's investigation and actions have included the following:

Immediately after May 8, Cargill checked all operational parameters and determined they were in compliance. Cargill conducted visual inspections of the dust collector lines on May 9 and 10 while dust collector was down. No issues were identified that would have been likely to have contributed to the exceedance. On May 12, during dust collector downtime, 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. Dust collector was taken down on May 18 for additional cleaning for 12 hours. Entire dust collector system was cleaned, including mist eliminator, pipes, and stack.

On May 12, while the dust collector was down, Cargill brought two additional third party companies (ENER-TECH and HDR), each 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 issues that would have been likely to cause the exceedance.

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. However, having found no major issues that would have clearly contributed to the April 12 results, ENER-TECH made recommendations for small adjustments that could be made to the system.

On May 22, BT Environmental Consultants performed a follow-up engineering test on the EUPRETZEL dust collector. Cargill received results May 31. All three test runs were well under the permissible limit with an average of 3.69 lb/hr.



During the month of June, Cargill continued to perform small adjustments throughout the EUPRETZEL unit as recommended by ENER-TECH, as opportunities for improvements to reach optimal efficiency. Some of the adjustments made were to reduce the fan velocity, lower the water flow rate through the dust collector, and rebalance the airflow thru the system.

As a follow-up step with MDEQ, Cargill plans to schedule a follow-up PM test on the EUPRETZEL. Ahead of that test, please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that appears to read "Priscila Gavel".

Priscila Gavel  
EHS Professional  
Cargill Salt St. Clair

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