January 14, 2020

Ms. Monica Brothers
Environmental Quality Analyst
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
7953 Adobe Road
Kalamazoo, MI 49009

Re: Response to December 10, 2019 Violation Notice
Post Consumers Brands - PCB (SRN B1548)

Dear Ms. Brothers:

This letter is in response to your Violation Notice (VN) dated December 10, 2019. The VN alleges that the following compliance issue occurred:

Process Description	Rule/Permit Condition Violated	Comments
FG2983CoatOxdOn	MI-ROP-B1548-2014d, Special Condition IV.2	Stack test results showed Special Condition IV.2 that the combined VOC capture and destruction efficiency was below the required minimum of 85.5% (by weight).

The VN requested that PCB provide EGLE with additional information, which we have done in the following sections.

PCB performed a stack test on April 17, 2019 to determine the VOC capture and destruction efficiency of FG2983CoatOxdOn. The result of the testing indicated that the catalytic oxidizer was achieving adequate destruction efficiency. The capture efficiency results that were calculated as a result of the testing were unable to demonstrate that expected levels of capture were being achieved. The capture efficiency that was calculated resulted in a combined capture/destruction efficiency that was below the required 85.5%. During the testing completed in April, PCB identified potential quality control issues with the laboratory samples used in determining uncontrolled emission rates. These issues were detailed in our June 17, 2019, letter. Previous testing performed in 2009 on the system indicated that capture efficiency was greater than 100% and destruction efficiency was 99.8%. Since the 2009 testing, PCB has continued to operate the catalytic oxidation system within the operating parameters observed during the previous testing and within the required temperatures in our ROP. PCB has also completed all required routine maintenance and some system upgrades during the last year, including:

- Heat Exchanger replacement
- Heat Shield installation (to prevent catalyst damage)

requirements can be met or accurately measured. Given that VOCs are being captured in multiple phase states (i.e. vapor and liquid), retained on the flakes, and various other complicating factors, it is clear that there are inherent difficulties in accurately measuring capture efficiency. It is our understanding that US EPA tried to do a mass balance on cereal coating VOCs including the rotoclone sampling and their final results also did not make sense. For this reason, PCB has chosen to pursue a modification to the facility's air permit. PCB has setup a meeting with the EGLE permit unit to discuss potential permit changes that will properly reflect desired operation and maintenance of the control and capture efficiency systems.

As discussed above, PCB has already been working diligently and exhaustively to resolve this issue. It has thoroughly investigated the potential causes of the capture efficiency issue and has sought resolution by engaging experts in the field to assist. These include:

- While the inspection performed by Dürr indicated that the catalytic oxidizer was operating properly, Dürr did recommend some changes in operation of system fans. Adjustments were made to the system while Dürr was onsite to optimize system performance. Following the adjustments, Dürr re-inspected the system and concluded that the system is operating effectively.
- Dürr also indicated that PCB should balance the drying portion of the process and then re-balance the entire system to match the dryer. PCB dryer experts are working to balance the dryer during the current production run. At the conclusion of the production run, the entire system will be re-balanced per Dürr.

As aforementioned, PCB believes the system to be operating at an optimal level. PCB has implemented the system changes recommended by Durr. However, based upon the factors noted above, and in consultation with experts, measuring capture efficiency accurately is in question. In addition, PCB has set up a pre-application meeting with EGLE permit staff on January 22, 2020, to discuss needed air permit changes. PCB has also made the inspection performed by Dürr and the balancing of the system a part of their annual maintenance program.

PCB is fully committed to and believes it is operating in compliance with all applicable air quality requirements and, as aforementioned, is working expeditiously and exhaustively to address this issue. Any suggestions EGLE may have would be greatly appreciated.

Sincerely,

Robert Mason

Robert Mason
EHS Manager – Battle Creek
Post Consumer Brands

cc: Ms. Jenine Camilleri, Enforcement Unit Supervisor, EGLE