



Kraft Heinz Company
431 West 16th Street
Holland, MI 49423-3497
Phone: 616-396-6557

May 26, 2017



Ms. Kaitlyn DeVries
Michigan Department of Environmental Quality
Grand Rapids District Office
350 Ottawa NW – Unit 10
Grand Rapids, MI 49503-2341

Re: Violation Notice dated May 8, 2017

Ms. DeVries:

Kraft Heinz Company (“Kraft Heinz”) timely submits this response to the May 8, 2017 Violation Notice (“VN”). This letter provides a brief statement of facts, a response to the alleged violations and the corrective actions taken. By submitting this response, Kraft Heinz does not make any admissions of fact or law, or waive any of its defenses to those alleged violations.

A. Brief Statement of Facts

Earlier this year, Kraft Heinz’s facility, located at 431 W. 16th Street in Holland, MI (the “Facility”) installed new Heating Ventilating and Air Conditioning (“HVAC”) equipment for the new mustard processing area, which includes the main batching area and the final pressing area. The only purpose of the HVAC equipment is to remove the mustard oil fumes from the mustard processing area for employee comfort. During the project planning phase for the new mustard processing area and prior to beginning construction, Kraft Heinz completed an air permit exemption determination and determined that the operation was exempt from the Rule 201, Permit to Install requirements, because it is exempt under Rule 336.1290. The new equipment has limited emissions, and thus falls within Rule 336.1290(2)(a)(i).

Kraft Heinz discovered that the exhaust from the new HVAC equipment included particulate matter from the processed mustard grains. Kraft Heinz halted the production at the Facility and began an investigation into the source and cause of the particulate matter in the exhaust. Immediately, Kraft took specific measures to install temporary filtration in place to ensure the particulate matter was not further exhausted. Additionally and pursuant to Michigan DEQ regulations, on April 13, 2017, Kraft Heinz notified Michigan Department of Environmental Quality of the particulate matter in the HVAC exhaust. Based upon Kraft Heinz’s investigation, Kraft Heinz concluded that the particulates



Kraft Heinz Company
431 West 16th Street
Holland, MI 49423-3497
Phone: 616-396-6557

pulled into the HVAC exhaust was caused by a malfunction in the HVAC equipment.

In response to the malfunction, Kraft Heinz conducted corrective actions. Kraft Heinz removed the HVAC connections to the press equipment that was source of the particulate matter and cleaned the HVAC system and fans of any residual particulate matter. Additionally, Kraft Heinz conducted a review of its internal records and confirmed that the exemption under Rule 336.1290(2)(a)(i) applies. Pursuant to Rule 336.1290(2)(d), attached please find the monthly records of process batching/emissions to demonstrate that the exemption was being met, the same copies that were previously provided to you on May 12, 2017. The information from these records for 2016 was included with our 2016 Michigan Annual Emission Reporting System ("MAERS") reporting. Pursuant to Rule 336.1290(2)(e), the records are maintained on file for two years. Kraft Heinz is also investigating additional adjustments to the HVAC equipment to assure that no particulate matter is in the exhaust. Kraft Heinz will also continue to monitor the exhaust to confirm that no particulate matter is released.

B. Kraft Heinz's Response to the Alleged Violation and Corrective Actions

In the VN, MDEQ alleged a violation of Rule 201 for failure to obtain a permit for installation of the new equipment. As described above, the new equipment is exempt from requiring a permit to install because it has limited emissions, and thus falls within Rule 336.1290(2)(a)(i), as long as the equipment continues to not exhaust particulate matter. Additionally, Kraft Heinz has taken the following corrective actions to cease any further releases of particulate matter in the HVAC exhaust:

1. Removing the HVAC connections to the press equipment that was the source of the particulate emissions.
2. Cleaning the HVAC system and fans to remove any built up of particulate matter.
3. Monitoring the process exhaust to confirm that no particulate matter is released.
4. Confirmation that the terms of the exemption to the permit to install under Rule 336.1290(2)(a)(i) apply the Facility continues to maintain the requisite documents for trending and compliance of monthly and annual threshold requirements.

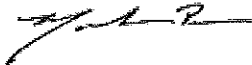
Because these activities have been completed, compliance has been achieved for the alleged violation. If the MDEQ does not agree with Kraft Heinz's permit exemption determination or that the alleged violation is not resolved, Kraft

KraftHeinz

Kraft Heinz Company
431 West 16th Street
Holland, MI 49423-3497
Phone: 616-396-6557

Heinz would like to schedule a time to meet. To schedule this meeting or if you have any questions regarding the information above, please don't hesitate to contact me at the Facility.

Sincerely,
Kraft Heinz Company



Marena Rash
Engineering Manager

CC: D. Edwards
K. Patel
T. Haggard
M. Kwiatkowski
Heidi Hollenbach
Lynn Fiedler
Mary Ann Dolehanty
Chris Ethridge
Thomas Hess