



Zeeland Farm Services, Inc.®

May 24, 2018

Tyler Salamasick
Environmental Quality Analyst
Grand Rapids District Office
State Office Building, 5th Floor
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2341



Re: Violation Notice
ROP: MI-ROP-M4204-2012b
Zeeland Farm Services, Inc. (SRN: M4204)

Dear Mr. Salamasick:

Zeeland Farm Services, Inc. (ZFS) respectfully submits this response to the violation notice issued May 9, 2018. The violation is for a failure to stack test all equipment under FGEXTRACTION every five (5) years (ROP No. MI-ROP-M4202-2012b, FGEXTRACTION, Special Condition V.1). The specific equipment that was not tested within the five year time frame was EUEXTRACTION

FGEXTRACTION consists of four (4) emission units: EUEXTRACTION, EUDTDC, EUSTORAGETANK, and EUDUMPTANK. The units EUSTORAGETANK and EUDUMPTANK are hexane storage tanks and not required to be stack tested. In September 2015, EUDTDC was installed to replace EUDTDCDRYER and EUDTDCCOOLER (PTI-165-14). After installation, EUDTDC was stack tested on November 4, 2015.

Through the process of permitting, installing, and testing EUDTDC, staff did not recognize the five year requirement to also test EUEXTRACTION. It was assumed that stack testing of EUDTDC satisfied the stack testing requirements present in FGEXTRACTION.

The last test conducted for EUEXTRACTION occurred on December 6, 2011. Therefore, the equipment was due to be tested in calendar year 2016. Because the equipment has not been tested since the previously noted date, the violation is still ongoing. ZFS has hired Montrose Environmental to conduct stack testing for EUEXTRACTION the week of August 27, 2018. ZFS will submit a stack testing plan to the AQD by June 27, 2018 for approval. A complete report of the results from the testing will be submitted to the AQD within 60 days of the completed test.

To prevent a reoccurrence, ZFS will take the following steps:

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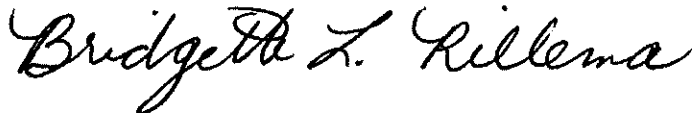
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- Upon final issuance of a new ROP, environmental staff will thoroughly review the stack testing requirements for each piece of equipment and develop a schedule of when each piece of equipment is due for testing.
- The schedule will be shared with plant operation management such that they are aware of what equipment needs to be tested by which dates, and so that stack tests can be scheduled for times when equipment will be operating.
- The stack testing schedule will be reviewed periodically and updated upon completion of stack testing to signify the next due date.
- If equipment is installed or modified such that a PTI is required, staff will update the stack testing schedule based upon the PTI that is issued.

If you have any questions regarding this submittal; please contact me at bridgetter@zfsinc.com or 616-879-1711.

Sincerely,

Zeeland Farm Services, Inc.



Bridgette L. Rillema, P.E.
Environmental Manager