



□ CARO  
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EGLE-AQD  
JUN 03 2023  
Bay City

June 26, 2023

Gina McCann  
Environmental Quality Analyst  
State of Michigan Department of Environment, Great Lakes, and Energy  
Air Quality Division, Bay City District Office  
401 Ketchum Street, Suite B  
Bay City, MI 48708

Dear Gina McCann,

This letter is in response to the "NOV Response Follow Up" received by POET Biorefining – Caro, LLC (POET) from EGLE on June 1, 2023. As requested, POET is providing updated documentation related to the requests in the follow up email, as documented here:

*Additionally, SC IV.2. of FERM&DIST in MI-ROP-N6996-2018a restricts operation of any equipment in FGF&DIST unless one of the scrubbers (CE004 or CE014) is installed, maintained, and operated in a satisfactory manner, except as allowed by SC III.3. Satisfactory operation of the scrubber includes maintaining the scrubber liquid flow rate and pressure drop in the range identified in the MAP as constituting satisfactory operation. An excursion of the scrubber liquid flow rate and pressure drop limit is the exceedance of the operational parameter limit or acceptable range defined in the MAP. The approved MAP and CAM plans identify the 3-hour average differential pressure to be less than 15 inches of water column and the average 3-hour water flow rate to be 30 gallons per minute (GPM) with mash flow online, and after 36 hours of mash flow offline 15 GPM. The CAM rule aims to have owners and operators maintain their control devices at the levels that assure compliance. CAM plans should identify representative parameters upon which compliance can be assured, establish indicator ranges and use performance testing and other information to verify the parameters and ranges represent compliance. Further, these plans should provide a description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits. EGLEAQD requests Poet to reevaluate their monitoring parameters and provide revised CAM and MAP plans within 30 days of receiving this letter.*

POET provides the following updates to the MAP and CAM plans.

The MAP has been evaluated to ensure the parameters set forth for Wet Scrubbers CE004 and CE014 constitute satisfactory operations based on Compliance Stack Testing. This document also reflects updates for operating parameters of the RTO and TO, based off of Compliance Stack Testing. The differential pressure for each Scrubber has been adjusted, to be a better indication of potential performance concerns that may require action. Lastly, the RTO inlet outlet temperature differential has been removed, as combustion chamber temperature is adequate to determine proper operation of the RTO.

The CAM has been evaluated to remove EUSTILLAGETANK and EURTO as identification from the Wet Scrubbers. Additionally, documentation regarding RTO Scrubber Bypass Episodes has been removed. EUSTILLAGETANK has also been added as identification to TO&HRB and RTO, and TO and RTO temperatures have been updated to reflect the parameters set forth from Compliance Stack Testing. The differential pressure for each Scrubber has been adjusted, to be a better indication of potential performance concerns that may require action. Lastly, the RTO inlet outlet temperature differential has been removed, as combustion chamber temperature is adequate to determine proper operation of the RTO.

If you need additional information or have questions, please feel free to contact Coryn Houser at 989-286-3847 or [Coryn.Houser@POET.com](mailto:Coryn.Houser@POET.com).

Sincerely,

Doug Deland  
General Manager  
POET Biorefining - Caro