



August 15, 2019

Dear Amanda,

I apologize for the delay, we have been investigating this issue and potential countermeasures. Although we do not believe ReConserve is the source of all material in the violation and would like to have this changed to a warning rather than a violation, we have been investigating diligently.

Various starches are used in both of our products so it has taken time to isolate the source and why it only occurs sporadically. Based on what we have found the powders appear to be our issue, the starch and creamer are very fine powder and appear to be slowly passing through the baghouse filters. Although the amount is relatively small it aerates easily through the blower and can carry off property.

The system was reviewed to see why this occurred. Material was found to be getting by the filters and onto the impeller, so the filters did not filter all of the material. No cuts or tears were found in the filters and the sealing surfaces appeared to be good. The rating on the filters is MERV 11 which is per the original design for a grain application. This is likely not fine enough to stop the powders until the filter starts to cake. The filters were changed regularly every 3 months. During visual inspections no particulates were seen leaving the stack.

We are looking at alternate processing methods for this product that would draw off the material but run it through a cyclone and then to the RTO rather than directly to the bag house. We have 3 quotes on this process and are having it reviewed by corporate currently. We should be able to have this implemented in the next 60 days.

In the short term, we would like to have a deviation to run the roto-chop without running the baghouse and blower. This leaves the dust inside the roto-chop and production floor where it would settle out and be cleaned up manually.

Regarding when the violation occurred other than the night of May 7th, I cannot identify specific dates due to the nature of the process mentioned above. The system was installed 11/1/16 with the MERV 11 filters. If we were to re-start the system, MERV 15 filters would be implemented. This would be a backup alternative to the process flow change mentioned above.

Warm regards,

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