



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

May 17, 2018

Mr. Stanley Raak  
Standing Rock Farm  
4240 20th Street  
Dorr, Michigan 49323

SRN: P0779, Allegan County

Dear Mr. Raak:

**VIOLATION NOTICE**

On May 15, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a review of the reported emissions to the Michigan Air Emissions Reporting System of Standing Rock Farms (Facility), located at 4240 20th Street, Dorr, Michigan. The purpose of this review was to audit the emissions reported and determine the Facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) No. 213-16.

During the review, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUDRYER- 1.2 million BTU per hour natural gas fired roatry dryer used in the production of animal feed	PTI No. 213-16, Special Condition EUDRYER I.1	The Facility reported a VOC emission limit higher than the VOC emission limit in the permit.
EUDRYER- 1.2 million BTU per hour natural gas fired roatry dryer used in the production of animal feed	PTI No. 213-16, Special Condition EUDRYER VI.1 and EUDRYER VI.4	Staff of the AQD asked if there were any records of material throughput or dryer operating hours and was told no records are kept.

During this review, the Facility was unable to produce emission records. This is a violation of the recordkeeping and emission limitations specified in Special Condition EUDRYER VI.1 and EUDRYER VI.4 of PTI No. 213-16.

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The conditions of PTI No. 213-16 require the permittee to keep, in a satisfactory manner, the following information on a monthly basis for EUDRYER:

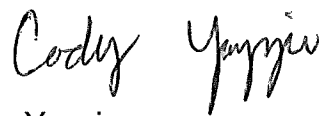
- The amount in tons of food byproducts dried per calendar month.
- The amount in tons of food byproducts dried per 12 month rolling time period as determined at the end of each calendar month, the hours of operation per calendar month, and the hours of operation per 12 month rolling time period as determined at the end of each calendar month. (i.e., maintenance of records, which shall be made available for review upon request by the AQD staff).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 7, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If the Facility believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my review of the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Cody Yazzie  
Environmental Engineer  
Air Quality Division  
269-567-3554

CY:CF

cc: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Malcolm Mead-O'Brien, DEQ  
Ms. Mary Douglas, DEQ