

DEQ-AQD

JUL 26 2021

SAGINAW BAY

July 21, 2021

Mr. Ben Witkopp
EGLE-AQD
Bay City District Office
401 Ketchum Street, Suite B
Bay City, Michigan 48708

Re: Quality Roasting (P1000)
VN #20210720

Dear Mr. Witkopp,

This letter is in response to the violation notice (VN) issued on July 20, 2021 to our Reese Michigan facility. The VN identified above specifically acknowledges the exceedance of the hourly particulate matter (PM) emission rate for our soybean roaster. The exceedance was reported, as part of a compliance stack test report submitted July 13, 2021 and delivered to your office on July 14, 2021. Specifically, the test report stated that the average combined hourly PM emission rate from the soybean roaster was determined to be 5.9 lbs /hr hour.

Our permit (PTI #61-20) limits for the roaster hourly PM emission rate to 2.16 lb/hr. This limit was established during the permitting process based on an emission factor from a US EPA's AP-42 guidance document. Since the AP-42 did not provide an exact process match for soybean roasting we made our emission projections based on an emission factor for coffee bean roasting, expecting this to be a similar operation with a similar emission rate.

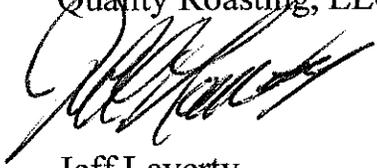
The soybean roaster itself is equipped with two cyclone particulate control units, operating in parallel. We do not believe that these units were malfunctioning at the time of the compliance stack test. In addition, the stack concentration associated with the reported hourly emission rate is in compliance with Michigan Rule 331 (R 336.1331), Table 31(J). Therefore, we conclude that this was simply a mis-application of an emission factor in the development of the PM emission rate for the current air permit. With a site and process specific emission rate, our proposed resolution to this violation is to present a permit modification to the EGLE-AQD Permit Unit, to revise the PM emission rate for EU-ROASTER.

Mr. Ben Witkopp, EGLE-AQD
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Our consultant Bruce Connell, Environmental Partners, Inc. is working to develop a permit modification application, with the intention of submitting it to EGLE-AQD by August 20, 2021, approximately 30 days from the date of this letter.

We believe that by utilizing a site-process specific emission rate that meets state regulatory requirements we will have satisfactorily addressed this violation notice. Should you have any questions, please feel free to contact either myself at 989-868-7136 or my supervisor, Scott Rabe at 920-775-9279.

Sincerely,
Quality Roasting, LLC



Jeff Laverty
Site Manager

Cc: Mr. Scott Rabe, Quality Roasting, Inc.
Ms. Mary Ann Dolehanty, EGLE-AQD
Dr. Eduardo Olaguer, EGLE-AQD
Ms. Jenine Camilleri, EGLE-AQD
Mr. Christopher Ethridge, EGLE-AQD
Mr. Chris Hare, EGLE-AQD