



Star of the West Milling Co.

P.O. Box 146
Frankenmuth, MI 48734
989-872-5847
FAX 989-872-2668

May 21, 2024

EGLE
Air Quality Division
Michigan Department of Environment, Great Lakes and Energy
401 Ketchum Street, Suite B
Bay City, MI 48708

RE: Violation Notice – SRN: U372308129
Rule 901 Act 451

Dear Mr. Witkopp,

We sincerely thank you and Ms. McCann for visiting with our staff at the Shepherd facility to discuss the nature of this violation and future planning in mitigating/eliminating any unintentional impact we may have on surrounding properties. As we discussed the proportionally appropriate amount of grain storage on site is not only integral to the sustainable presence of Star of the West in the Shepherd community but it is also an important marketplace outlet for the area's agricultural producers. We are optimistic that we can address the challenges of fugitive dust emissions in a fashion that incorporates both short term and long-term operational goals while remaining compliant with established requirements.

Our strategic plan includes the following improvement objectives. In an effort to retrieve the remaining corn pile in storage we intend on using a Sudenga Ultra Scoop flat storage auger to transport the grain from the pile into the back of trailers. This will be a marked improvement over the use of loader equipment dumping grain directly into a trailer. Improvement to the rail loadout will be completed that incorporates an additional hopper(s) and spouting that reduces the level of fall, concentrates the stream of flow thereby reducing the amount of dust created by the loading of railcars.

Prior to harvest commencing this fall and the construction of a new pile Star of the West will implement the use of Drive Over Hoppers and hopper bottom style trailers which will feed a conveyor equipped with a telescoping discharge spout. This method of grain handling will reduce the exposed release of grain and the vertical fall of the commodity to the growing pile. As harvest approaches, Star of the West staff will communicate with our neighbors and community administrators, how we intend to mitigate the impact of harvest operations while asking for the patience of the community when increased congestion, and activities may affect their typical activity in town.

From a long- term perspective Star of the West would like to substitute the use of an exposed grain pile with fixed grain storage that is a component of a fully integrated receiving and distribution system. The company also intends on sheltering the current receiving "pit" that is now exposed allowing dust to be emitted as a result of the receiving of grain from local farmers. This stage of our strategic plan will

require capital investment approval, be dependent upon certain supply chain constraints and require that work occur around the increased activity posed by harvest. A purposeful improvement plan will be provided to EGLE by September 30th on how Star of the West intends on full replacement of the current pile and the conditions it presents.

Star of the West genuinely believes that these improvements will allow us to be compliant with air quality requirements presently and position us for sustained success in the future. If you have any questions or concerns regarding this response please be certain to contact me.

Sincerely,
Patrick Nellenbach

Patrick Nellenbach

Director of Safety and Security
Star of the West Milling Co.
121 E Tuscola St
Frankenmuth, MI 48734

CC: Jim Howe, Bob Kennedy, Keith Martus, Jenine Camilleri and Gina McCann