



The Andersons, Inc.  
P.O. Box 119 Maumee, Ohio 43537

October 3, 2024

Mr. Jared Edgerton  
Environmental Quality Analyst  
EGLE-Air Quality Division  
7953 Adobe Road  
Kalamazoo, Michigan 49009-5026

RE: Violation Notice dated September 12, 2024 for EU-GRAINRECEIVE process  
Response on behalf of The Andersons Marathon Holdings LLC

Dear Mr. Edgerton,

The Andersons Marathon Holdings LLC-Albion (TAMH-A) Facility acknowledges receipt of EGLE's Violation Notice (the "Notice") dated September 12, 2024 for emissions unit EU-GRAINRECEIVE. This Notice was sent in response to self-reported deviations in the TAMH-A Semi-Annual ROP certification report. As requested in the Notice, we have prepared the following response including *"dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence"*.

As briefly described in the Semi-Annual ROP certification report, the reported deviations occurred during the construction of an approximately \$6 million capital project to completely revamp and improve management of fugitive dust in EU-GRAINRECEIVE. TAMH-A's operation of emissions unit EU-GRAINRECEIVE has been governed under PTI No. MI-PTI-B8570-2023, and ROP No. MI-ROP-B8570-2023 (the "Operating Permit"). As described in the Operating Permit, grain receiving would occur in "two truck unloading enclosures, each with a capacity of 15,000 bushel/hr., each with one receiving pit located at the grain elevator" and controlled by baghouse C-201. Despite TAMH-A's full compliance with the emission unit conditions under the Operating Permit over the years, it was determined that in order to improve and overcome the limitations of this current unloading enclosure for EU-GRAINRECEIVE, a significant financial investment was needed to completely remodel and improve the process with an enclosed building to reduce fugitive dust while still controlling emissions with the baghouse.

Therefore, TAMH-A sought authorization from EGLE in the form of the construction air permit to install (PTI) No. 17-24 issued on February 16, 2024. Upon completion of this project, EU-GRAINRECEIVE will be equipped with a new 148'x48' receiving building which will completely enclose two grain trucks to allow simultaneously receiving of grain at two independent receiving pits. Each receiving pit will be equipped with automatic entry and exit overhead high-speed doors, which will fully enclose the building during grain receiving operations. Once complete, the existing baghouse C-201, together with the total enclosure, are designed to prevent fugitive dust from exiting the building.

The construction project pursuant to PTO 17-24 began on May 15, 2024. Prior to that date, TAMH-A, through its operations and environmental personnel, attempted to maximize all grain receipts into the facility and into the receiving pits at EU-RECEIVE so as to avoid having to operate those receiving pits during actual construction. On May 16, 2024, baghouse C-201 needed to be decommissioned to allow construction of the new receiving building enclosure. The receiving pits at EU-GRAINRECEIVE were not removed as part of the construction until June 6, 2024. In the interim, despite TAMH-A's best efforts, there were portions of seven (7) days over the next three-week period where business- and safety-critical circumstances led to the facility having to receive grain at the EU-GRAINRECEIVE without an operating baghouse. Specifically, on the following dates and durations, business- and safety-critical scenarios arose that required EU-GRAINRECEIVE to be operated without baghouse C-201:

- 5/17/24 (duration ~5.1 hrs.)
- 5/20/24 (duration ~0.2 hrs.)
- 5/21/24 (duration ~5.0 hrs.)
- 6/3/24 (duration ~4.4hrs.)
- 6/4/24 (duration ~7.1 hrs.)
- 6/5/24 (duration ~7.3 hrs.); and
- 6/6/24 (duration ~6.5 hrs.) (a total of approximately 35 hours).

TAMH-A did not anticipate that it would not be able to accommodate grain receiving during the period of construction, but when the alternative grain receiving locations (discussed below) became full to capacity and trucks became backed up outside of the facility roadways into the public right-of-way causing safety concerns, and the facility was facing a business-critical situation with continued operations, the reported deviation occurred at the EU-GRAINRECEIVE unloading area.

During this time, TAMH-A did the following to minimize potential dust emissions: (1) sent grain trucks to EU-TRUCKPIT (which has limited capacity but is controlled by baghouse C-20); (2) sent grain trucks to the "rail pit" located to the east of the grain silos for overflow grain receiving as this site is subject to grandfathering for operation prior to the current permitting; (3) used hopper bottom trucks as much as possible to reduce drop distance from transfer points; and (4) employed at all times housekeeping, roadway and plant yard sweeping and material spillage cleaning practices. Most importantly, during this three-week period prior to the EU-GRAINRECEIVE receiving pits being removed, they did not receive a majority of the grain receipts coming into the plant, and further the facility was able to fully avoid using those pits during approximately thirteen (13) operating days in that period. It is the belief of TAMH-A that at no time during this period was there a significant endangering of human health, safety or the environment on account of the actions taken to minimize or eliminate fugitive dust.

TAMH-A can confirm that any deviation from permit terms was limited in duration to those isolated days listed above and ceased fully as of June 6, 2024, and is not an on-going violation. A reoccurrence of this violation will not occur because, TAMH-A will ensure that baghouse C-201 is operational before the remodeled EU-GRAINRECEIVE is placed back into operation upon completion of the project. This is expected to occur on October 10, 2024.

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In closing, The Andersons Marathon Holdings LLC - Albion believes that the steps taken to finance, design and construct a state-of-the-art grain receiving building will prevent reoccurrence of deviation and eliminate fugitive dust at EU-GRAINRECEIVE, making the situation and control of dust better than ever before at this facility. We understand the gravity of the situation created by our deviation and took all possible steps to avoid it and minimize emissions during operation of EU-GRAINRECEIVE.

Sincerely,

A handwritten signature in dark ink, appearing to read "Harley Darnell", with a long horizontal flourish extending to the right.

Harley Darnell  
Plant Manager  
The Andersons Inc.  
517-680-7108

cc: Ms. Jenine Camilleri, Compliance Supervisor – MI EGLE  
Mr. Evan Dankert, EHS Manager - TAMH - A

