



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
BAY CITY DISTRICT OFFICE



DANIEL EICHINGER
ACTING DIRECTOR

February 10, 2023

Doug DeLand
Poet Biorefining-Caro LLC
1551 Empire Drive
Caro, Michigan 48723

SRN: N6996, Tuscola County

Dear Doug DeLand:

VIOLATION NOTICE

On December 1, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Poet Biorefining-Caro LLC (Poet) located at 1551 Empire Drive, Caro, Michigan. The purpose of this inspection was to determine Poet'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 (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N6996-2018a.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFLOUR	S.C. III.1.1. The permittee shall not operate any equipment in FGFLOUR unless its associated baghouses (Hammermill 1-5) are installed, maintained, and operated in a satisfactory manner.	Maintenance on Hammermill #5 baghouse could not be verified.
FGDDGSDRYERS	SC IV.2. Satisfactory operation of the thermal oxidizer and regenerative thermal oxidizer required to maintain temperatures according to MAP to achieve 95% destruction efficiency. SC VI.11. An excursion is defined by any three-hour block average where the temperature	Thermal oxidizer below required 1468F. 04-08-2022 6:00pm temp was 1461.3F 08-25-2022 12:00am temp was 1439.5F 08-25-2022 1:00am 1370.8F

	<p>from the thermal oxidizer EUTO&HRB (CE010) or the temperature from the regenerative thermal oxidizer EURTO (CE012) falls below the normal operating values specified in the MAP. Excursions trigger an internal investigation, corrective action(s) and a CAM excursion summary reporting requirement. (40 CFR 64.6(c)(2))</p> <p>R 336.1910</p>	<p>10-12-2022 10:00am 1289.5F</p> <p>10-12-2022 11:00am 1291.2F</p> <p>Regenerative thermal oxidizer below 1643F.</p> <p>10-12-2022 10:00am 1436.9F</p> <p>10-12-2022 11:00am 1516.5F</p>
FGDDGSDRYERS	SC VII.2. and MI-ROP-N6996-2018a, General Condition 22	Semi-annual report did not include deviations of thermal oxidizer or regenerative thermal oxidizer temperatures.
FGDDGSDRYERS	Each semiannual report of deviations shall include summary information on the number, duration, and cause of excursions and/or exceedances and the corrective actions taken. (40 CFR 64.9(a)(2)(i))	Excursion not reported for 04-28-2022 temperature falling below normal operating values.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 3, 2023 (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.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Poet 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.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Gina L. McCann". The signature is fluid and cursive, with a large initial "G" and "M".

Gina L. McCann
Environmental Quality Specialist
Air Quality Division
989-439-2282

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Chris Hare, EGLE