



November 16, 2020

Ms. Michelle Luplow  
AQD – Lansing District Office  
Michigan Department of Environment, Great Lakes, and Energy  
525 W Allegan, First Floor Southwest  
Lansing, MI 48909

**Re: Response to Violation Notice – November 16 Update  
ZFS Ithaca, LLC, SRN P0788**

Dear Ms. Luplow:

ZFS Ithaca, LLC (ZFS Ithaca) respectfully submits this follow up response for the Violation Notice dated September 22, 2020 regarding emission limit exceedances at EUDRYING1 for carbon monoxide (CO). ZFS Ithaca made adjustments to the burner per the manufacturer's recommendation and then attempted to retest the unit on November 11, 2020. However, while analyzing the preliminary CO emissions data of the equipment, the concentration of CO in the exhaust was still high enough that the unit would not pass the pound-per-hour limit.

ZFS Ithaca communicated with the dryer manufacturer throughout the day and attempted to make other burner adjustments, but the CO concentration did not reach a level that would meet the emissions limit. Therefore, ZFS Ithaca will not be testing again to meet the current permitted limits. The new corrective action will be to use the data from this engineering study and the June 2020 stack test to submit a new Permit to Install (PTI) application to raise the CO limits for EUDRYING1.

If you have any questions, please contact me by phone at 616-293-8150 or by email at [bridgetter@zfsinc.com](mailto:bridgetter@zfsinc.com).

Sincerely,

A handwritten signature in blue ink that reads "Bridgette L. Rillema".

ZFS Ithaca, LLC  
Bridgette L. Rillema, P.E.  
Environmental Manager

cc: Ms. Jenine Camilleri, EGLE