



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

November 15, 2023

Kevyn Coy
Rack Processing Michigan, LLC
3513 Lousma Drive SE
Wyoming, Michigan 49548

SRN: N7679, Kent County

Dear Kevyn Coy:

VIOLATION NOTICE

On November 8, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a review of Rack Processing Michigan, LLC's Renewable Operating Permit (ROP) Semi-Annual Deviation Report received on October 26, 2023, for the facility located at 3513 Lousma Drive SE, Wyoming, Michigan. The purpose of this review and the subsequent recordkeeping request was to determine Rack Processing Michigan, LLC'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) numbers MI-ROP-N7679-2018 and MI-ROP-N7679-2023.

During the report and records review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUBURNOFF	MI-ROP-N7679-2018 and MI-ROP-N7679-2023, EUBURNOFF, Special Condition No. IV.1	Failure to operate the burnoff oven at temperatures above 1,560°F during 49 batches.
EUBURNOFF	MI-ROP-N7679-2018 and MI-ROP-N7679-2023, EUBURNOFF, Special Condition No. III.3	Failure to calibrate thermocouples within one year of the last calibration.
EUBURNOFF	MI-ROP-N7679-2018 and MI-ROP-N7679-2023, EUBURNOFF, Special Condition No. IV.3	Failure to operate EUBURNOFF with a properly operating interlock system.
EUBURNOFF	MI-ROP-N7679-2018 and MI-ROP-N7679-2023, EUBURNOFF, Special Condition No. VI.5.b	Failure to calculate emissions using the data obtained during the most recent stack test.

A review of the ROP deviation report found that Rack Processing Michigan, LLC, had been operating EUBURNOFF at temperatures below the 1,560°F required by the permit since May 12, 2023. The deviation report covered the January 1- June 30, 2023, time period, and it is noted that MI-ROP-N7679-2018 was in effect until July 25, 2023. For the time period from July 26, 2023 to the present, MI-ROP-N7679-2023 was in effect so both permits are included in

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the violation table above. Following the ROP deviation report review, additional records were requested which showed that the temperature deviations continued undiscovered until the date the compliance status was reviewed internally by facility staff for the ROP deviation report. This report was late and was received on October 26, 2023, following the issuance of a Violation Notice. The records review also found other violations that were not reported as indicated in the table above. As such, the ROP deviation report should be corrected and resubmitted to include the additional deviations.

As a result of the delay in identifying the violations identified above and the equipment changes that caused them, the AQD is requesting that Rack Processing Michigan, LLC submit a Malfunction Abatement Plan (MAP) pursuant to Rule 911 for EUBURNOFF by December 30, 2023.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 6, 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 April Lazzaro at EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 or LazzaroA1@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Rack Processing Michigan, LLC 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.

Thank you for your attention to resolving the violations cited above. 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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE