

September 21, 2018

Ms. Kathy Brewer
Department of Environmental Quality
401 Ketchum St., Suite B
Bay City, MI 48708

Subject: Michigan Sugar Company's Response to the Violation Notice dated
September 4, 2018, SRN B1493 – Bay City Factory

Dear Ms. Brewer:

I am responding on behalf of Michigan Sugar Company ("MSC") to the September 4, 2018 Violation Notice issued by the Michigan Department of Environmental Quality (the "MDEQ") which alleges that the Bay City factory violated Rule 301 and General Provision 11 of its air permit (MI-ROP-B1493-2016) on August 23, 2018. The following is our response to the inquiries contained in the September 4, 2018 Violation Notice.

Anticipating the start of the campaign season, MSC initiated ignition of the Lime Kiln (EULIMEKLIN) on August 14, 2018. The Lime Kiln began operation under start-up conditions (in bypass mode) because it can take a significant amount of time to achieve a steady state in that emission unit. The vents for the Lime Kiln are utilized during the start-up and shut-down of the unit or during abnormal or emergency conditions. The vents are closed once the unit has achieved stable operation. When informed of the opacity concern identified by the agency, an attempt was made by the Bay City factory to continue the lime kiln startup with the vents closed (hoping the unit could be stabilized under such conditions). However, the vents had to be re-opened later that day due to concerns that combustion would cease, which could cause the emissions from the Lime Kiln to become unstable. Instrumentation readings at the time (including a drop in temperature indicating a loss of proper combustion) suggested that re-opening the vents was required to stabilize operation of the emission unit and to prevent a potential degradation or exacerbation of emissions.

As requested, Michigan Sugar is providing a copy of the log for the visible emissions surveys conducted between August 20 and August 30, 2018, which is attached hereto as **Exhibit A**. The visible emission logs do not indicate opacity in excess of 15% during that time period. As a result, Michigan Sugar cannot verify the start or duration of the alleged violation. Nevertheless, as noted above Michigan Sugar

undertook corrective actions as soon as it was notified of the MDEQ's concerns regarding opacity. Michigan Sugar believes that the Lime Kiln has been stabilized and that there are no ongoing opacity issues.

Thank you for your assistance in this matter. If you have additional questions regarding the event or this response, please contact me at (989) 686-0161 x 2236.

Sincerely,

A handwritten signature in cursive script that reads "Steve Smock". The signature is written in black ink and is positioned above the printed name.

Steven Smock, Environmental Manager

cc: C. Hare
N. Klein
J. Pfost
M. Eugster