

Kathy Brewer  
EGLE-AQD  
401 Ketchum Street  
Bay City, Michigan, 48708

August 5, 2022

Subject: Response to VN 20220718 Dated July 18, 2022  
MI-ROP-B1493-2021  
Michigan Sugar Company – Bay City Factory

Dear Ms. Brewer:

Michigan Sugar Company (MSC) respectfully submits this response to the July 18, 2022 Violation Notice (VN) issued by the Michigan Department of Environment, Great Lakes and Energy (EGLE). In that VN, EGLE cites a violation to 40 CFR Part 60, Subparts A and Db and MI ROP-B1493-2021 regarding MSC's Boiler # 6 and # 8 operation data at the Bay City Factory.

The VN indicates MSC failed to maintain and operate a CEMS to monitor the NOx in exhaust gas from Boiler #6 between February 3 to April 9, 2021, which is indicated as a violation to 40 CFR 60 Subparts A and Db and MSC's ROP. It also states MSC failed to report the CEMS quarterly downtime (out of control) January through March 2021 and April through June 2021, cited as a violation to MSC's ROP and failed to provide emission and operating data required to comply with 40 CFR Part 60 Subparts A and Db. Additionally the VN indicates MSC failed to maintain records of performed daily calibrations for Boiler #6 cited as a violation to MSC's ROP and 40 CFR Part 60 Subpart A and Db. Lastly the VN indicates MSC failed to continuously monitor nitrogen oxides and calibrate CEMS for Boiler #8 which is cited as a violation to MSC's ROP.

In the VN, EGLE requests MSC to respond with specific actions to correct the cited violations and should include;

1. The dates the violations occurred: See above.
2. Explanation of the causes and duration of the violations:
  - a. During maintenance activities performed on boiler #6, the CEMS autocalibration was manually turned off. Once the task was complete, the CEMS calibration was not turned back to autocalibration. The boiler was started back up and operated from February 3 to April 9, 2021 without the CEMS performing daily calibrations causing all data captured during that time period to be invalid.
  - b. The failed vacuum pump on the CEMS unit for boiler #8 that occurred on January 5, 2021 is unknown. The pump was replaced, tested, and operating properly on January 8, 2021.
3. Are the violations ongoing?
  - a. The Boiler #6 CEMS system was placed back into autocalibration on April 10, 2021.
  - b. The Boiler #8 CEMS vacuum pump was replaced and operational on January 8, 2021.
4. Summary of actions that have been taken/proposed to correct the violations and dates the actions will take place.

- a. A warning icon has been placed within the operator PLC window that flashes if there is an issue with the CEMS unit and the boiler is operating.
- b. Plant personnel are working to get coding in place that will provide another level of detection if there is an issue with the CEMS. This will be completed by end of year 2022.
- c. Training regarding proper operator response has taken place.

Additionally, the following documents are included with this letter.

- CEMS Operating Manual
- Resubmittal of 2021 First and Second Quarterly CEMS Operating Reports with corrected CEMS downtime.

If you have any questions or require further documentation, please feel free to contact me.

Sincerely,



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ec: Jason Lowry, MSC - Vice President of Operations  
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