

November 28, 2022

CERTIFIED MAIL AND ELECTRONIC
7020 1810 0002 1764 2207

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

CERTIFIED MAIL AND ELECTRONIC
7020 1810 0002 1764 2214

Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
P.O. Box 30260
Lansing, Michigan 48909-7760

Subject: Response to SVN 20221114 Dated November 14, 2022
MI-ROP-B1493-2021
Michigan Sugar Company – Bay City SRN 1493

Dear Ms. Brewer:

Michigan Sugar Company (MSC) respectfully submits this response to the November 14, 2022 Second Violation Notice (SVN) issued by the Michigan Department of Environment, Great Lakes and Energy (EGLE). In the SVN, EGLE states that the previous written response to VN20220718, (received by EGLE on August 5, 2022) failed to include or inadequately addressed several items.

The SVN indicates that the written response failed to include or inadequately address several items including but not limited to the following:

- MSC BC has not enumerated the CEMS elements that are critical to show compliance with CEMS quality assurance requirements. MSC BC provided segments of a CEMS operating manual. The manual includes hardware and software operation but does not detail the requisite quality assurance or quality control procedures and their associated acceptance criteria.
- A complete quality control manual for the facility's specific CEMS was not provided. This includes details of the steps and methods necessary to ensure the accuracy of the CEMS data in accordance with the applicable CEMS performance specifications and quality assurance procedures.
- Calibration calculations and corrective actions were referenced but not provided. Step-by-step procedures and acceptance criteria for the determination of CEM calibration drift are a required element of the above referenced quality control plan.
- MSC BC did not provide detail on operator training or refer to or include an established operator training procedure for CEMS.
- No documentation of CEM alarms, alarm setpoints, investigation or action taken in response to alarms was provided. Repeating a calibration in response to a failed calibration alarm does not constitute troubleshooting to determine the cause for the alarm.
- Additional requirements of 40 CFR 60, Appendix F, Procedure 1, and Michigan Monitoring Plans were not provided.

In the SVN, EGLE requests MSC to submit a complete CEMS monitoring Plan for the CEMS associated with Boiler#8 and FGBOILERS that meets the requirements of 40 CFR 60, Appendix F, Procedure 1, and Michigan Monitoring Plan Requirements for Gaseous Monitors. The procedures that were previously provided in the response to VN20220718 are the controls the factory uses for operating and maintaining the CEMS. The Bay City CEMS units are not equipped with an associated software package that provides formatted reports.

MSC is working to complete a CEMS monitoring plan for associated CEMS units within the Bay City facility that aligns with 40 CFR Part 60, Appendix F, Procedure 1. Once complete, MSC will submit copies to Ms. Kathy Brewer, Ms. Lindsey Wells and Ms. Jenine Camilleri with a target completion date of end of first quarter 2023.

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

Respectfully,



Meaghan Martuch
Air Compliance Manager
Michigan Sugar Company
Office: 989-686-0161, ext. 2236
Cell: 989-780-2550