



**305 Hoover Blvd, Suite 200
Holland, MI 49423
Ph: 616-928-9130
Fax: 616-928-9126**

April 26, 2023

Lindsey Wells
Technical Programs Unit
EGLE, Air Quality Division
Constitution Hall, 2nd Floor South
525 West Allegan Street
Lansing, Michigan 48933

Jenine Camilleri
Enforcement Unit
EGLE, Air Quality Division
Constitution Hall, 2nd Floor South
525 West Allegan Street
Lansing, Michigan 48933

Regarding: Response to Violation Notice, March 7, 2023
Michigan Sugar Company – Bay City Factory
SRN: B1493

Dear Ms. Wells and Ms. Camilleri:

Environmental Partners, Inc. (EPI) is responding on behalf of Michigan Sugar Company (“MSC”) to the March 7, 2023 violation notice (VN) regarding CEMs units on each of the 3 boiler units at their Bay City Factory. As we have previously indicated, MSC is evaluating its CEMs program in response to the VN, and has retained a CEMs expert from Mostardi Platt (MP) to assist the Company and EPI with the noted issues regarding the three continuous emission monitoring systems (CEMs units) serving Boilers #6, #7 and #8 (EUBOILER#6, EUBOILER#7, and EUBOILER#8) at the Bay City Factory.

On April 12, 2023 a team including MSC, EPI and MP visited the facility for the purpose of determining the CEMs unit status and to prepare a plan for addressing the alleged violations. The investigative team noted that quarterly audits of the instruments has been historically conducted, and focused on the operation and quality assurance components of the instruments. From that site visit, MP has recommended preventive maintenance be performed on the CEMs units. MSC will have MP perform the second quarter 2023 CGA’s during the preventive maintenance service in a combined event.

MP is scheduled to return to the site between June 1 and June 16, 2023 to perform the regularly scheduled CEMs unit CGA and they will take that opportunity to perform any necessary preventive maintenance on all three CEMs units. Mostardi Platt will correlate the CGA event with the unit data to ensure proper calibration of the CEMs equipment and provide onsite training to the CEMs operators to ensure proper procedures are followed going forward.

MSC and its representatives will provide the Michigan EGLE, Air Quality Division (EGLE-AQD) with the results of the 2nd Quarter CGA results upon completions. If either of you have questions regarding this response or the planned event, please contact either Meaghan Martuch at 989-686-0161 or me at 616-218-8353.

Sincerely,

ENVIRONMENTAL PARTNERS, INC.



Jeffrey M. Pfost

Principal Consultant to Michigan Sugar

cc: Jason Kain, Michigan Sugar Company
Nick Klein, Michigan Sugar Company
Angle Pichla, Michigan Sugar Company
Meaghan Martuch, Michigan Sugar Company
Kathy Brewer, EGLE-AQD, Bay City
Chris Hare, EGLE-AQD, Bay City
Matt Eugster, Varnum Law