



MICHIGAN
SUGAR
COMPANY

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July 17, 2023

Subject: Response to VN 20230626 Dated June 26, 2023
MI-ROP-B1493-2021
Michigan Sugar Company – Bay City Factory

Dear Ms. Wells,

Michigan Sugar Company (MSC) respectfully submits this response to the June 26, 2023 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 Db and MI ROP-B1493-2021 regarding MSC's Boiler # 8 CEMS monitoring downtime at the Bay City Factory.

The VN indicates MSC failed to continuously monitor NOx emissions during the 2023 First Quarter reporting period for Boiler #8, which is indicated as a violation to 40 CFR 60 Subparts Db and MSC's ROP – B1493-2021. Furthermore, the NOx monitoring downtime during this reporting period for Boiler # 8 was at 12.48% which exceeds EGLE's discretionary violation determination.

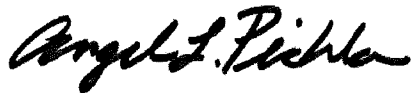
In the VN, EGLE requests MSC to respond with specific actions to correct the cited violations and are provided below;

1. The dates the violations occurred: First Quarter 2023
2. Explanation of the causes and duration of the violations:
 - a. Cause: Monitoring Equipment Malfunction: Faulty O2 Analyzer and NOx Concentration Program error

- b. Duration of violation: 264.65 hours
3. Are the violations ongoing?
 - a. No.
4. Summary of actions that have been taken/proposed to correct the violations and dates the actions will take place.
 - a. For the faulty O2 Analyzer, a new O2 Analyzer was installed on January 10, 2023, and a successful RATA was performed on the new O2 Analyzer on April 6, 2023. For the NOx Concentration Program error, the CEM system was rebooted to clear the program error.
5. Additional detail on the described 'NOx Concentration Program Error'.
 - a. It is understood that Boiler #8 CEMS monitoring screen froze, and therefore the data analyzer stopped recording data. The CEM system was rebooted which resolved the issue.
6. What steps are being taken to prevent a reoccurrence?
 - a. MSC has retained a third-party company that will perform maintenance activities and inspections to the CEMS units on a reoccurring basis to identify and resolve future CEMS downtime issues.

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

Sincerely,



Angel L. Pichla
Environmental Superintendent

ec: Nick Klein, MSC - Vice President of Operations
Eric Rupprecht, MSC- Director of Environmental
Jason Kain, MSC – Bay City Factory Manager
Meaghan Martuch, MSC – Air Compliance Manager
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