

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

<b>Facility :</b> Michigan Sugar Company - Sebewaing Factory	<b>SRN :</b> B2873
<b>Location :</b> 763 N Beck St	<b>District :</b> Bay City
	<b>County :</b> HURON
<b>City :</b> SEBEWAING <b>State:</b> MI <b>Zip Code :</b> 48759	<b>Compliance Status :</b> Non Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Benjamin Witkopp
<b>FCE Begin Date :</b> 3/5/2021	<b>FCE Completion Date :</b> 9/29/2022
<b>Comments :</b> VN sent 9-7-2022 for multiple issues including several missed stack tests, boiler MACT issues including but limited to not establishing operating parameters, and inadequate boiler MACT reports. Now, no semi-annual boiler MACT has been submitted at all.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/29/2022	ROP Semi 1 Cert	Non Compliance	Postmarked 9/15/22. Deviations included only those items listed in violation notice sent September 7, 2022. NOTE: In second semi-annual for 2021 there were 43 instances of problems reported with the stoker boilers WESP from 8-18-21 though 12-29-21. Apparently all WESP problems stopped at the start of 2022 or they weren't reported during the first 6 months of 2022. ALSO - no boiler MACT compliance report was submitted whatsoever. The non-compliance is due to the lack of the boiler MACT report and not the semi-annual cert at this time.
09/29/2022	CAM Excursions/Exceedances	Compliance	Postmarked 9/15/22
09/29/2022	CAM monitor downtime	Compliance	Postmarked 9/15/22
08/30/2022	MAERS	Compliance	The actual MAERS was received 3-15 but hardcopy was 3-16. NOTE: due to initial problems with the MAERS program the AQD provided a grace period to 3-25. Worked with Co. consultant, during summer period to try to get best submittal possible with data available

Activity Date	Activity Type	Compliance Status	Comments
03/30/2022	ROP SEMI 2 CERT	Non Compliance	Report cert was late per postmark. Electronic was received on 3-15. Form only listed dif pressure problems with FGpulpdryer multiclone and dif pressure drops for FGstokerboilers. It did not list periodic short term problems with underperforming WESP on the stoker boilers. However those problems were listed in day by day line item documentation. If problems with WESP continue into first half of 2022, VN may be in order Non Compliance is due to postmarked report being late. Not a VN situation for items stated or late report.
03/30/2022	ROP Annual Cert	Non Compliance	Report cert was late per postmark. Electronic was received on 3-15. Periodic short term problems with underperforming WESP for stoker boilers. If problems continue into first half of 2022, VN may be in order. The annual cert didn't include the items from the first half of 2021. From pervious cert during that period Issues reported were CAM related excursions. Note, this was the first time MSC employee prepared an annual cert. Non Compliance is due to postmarked report being late. Not a VN situation for items stated or late report.
03/30/2022	CAM Excursions/Exceedances	Non Compliance	Report cert was late per postmark. Electronic was received on 3-15. Wrong box was checked on semi-annual cert form which said 0 deviations though dev on FG pulp dryers occurred and were included. Deviations included for wet scrubber on FG stokerblrs5D though the scrubber is not even part of CAM controls. Non Compliance is due to postmarked report being late. Not a VN situation
03/30/2022	CAM monitor downtime	Non Compliance	Report cert was late per postmark. Electronic was received on 3-15. Non Compliance is due to postmarked report being late. No deviations. Not a VN situation.

Activity Date	Activity Type	Compliance Status	Comments
03/30/2022	MACT (Part 63)	Non Compliance	Boiler MACT Compliance Report. It appears some items, such as operating parameters may not be included in the report. Boiler MACT issue to be explored in-depth later. Non Compliance is due to postmarked report being late.
02/10/2022	On-site Inspection	Non Compliance	Facility Inspection and subsequent information review
10/21/2021	ROP Semi 1 Cert	Compliance	Issues reported were CAM related excursions. Appropriate actions were taken
10/21/2021	CAM Excursions/Exceedances	Compliance	Though the pressure drop for two of four multiclones was below range, the wet esp and venturi were operating so there is little likelihood of emissions problems. Later, the wet esp voltage dropped below range. Deluge system could not wash surfaces clean to restore power within range after several attempts. The boilers were shut down and the problems fixed between campaigns. Appropriate actions were taken.
10/21/2021	CAM monitor downtime	Compliance	no deviations
08/03/2021	MAERS	Compliance	timely
04/30/2021	ROP Annual Cert	Compliance	report received timely
04/30/2021	ROP SEMI 2 CERT	Compliance	report received timely
04/30/2021	CAM Excursions/Exceedances	Compliance	no deviations
04/30/2021	CAM monitor downtime	Compliance	no deviations
03/16/2021	On-site Inspection	Compliance	Facility inspection

Name: B. W. Hoff

Date: 9-30-22

Supervisor: C. Shore