

October 26, 2018

Mr. Matthew R. Karl
Department of Environmental Quality
401 Ketchum St., Suite B
Bay City, MI 48708

Subject: Michigan Sugar Company's Response to the Violation Notice dated
September 25, 2018, SRN B1493 – Sebewaing Factory
ACO: No. 16-2017

Dear Mr. Karl

I am responding on behalf of Michigan Sugar Company ("MSC") to the September 25, 2018 Violation Notice issued by the Michigan Department of Environmental Quality (the "MDEQ") which cites and alleges that the Sebewaing factory violated Rule 371 and EU-LIMEKILN SC.VI.1 / R336.1213(3) and R 336.1301 of its air permit (MI-ROP-B2873-2012) on September 19, 2018. The following is our response to the allegations and the requested response contained in the September 4, 2018 Violation Notice.

Fugitive Dust plan, violation of Rule 336.1371, the company is taking steps to resolve this issue. The plan has been obtained and the documentation is now being updated. It should be completed soon EU-LIMEKILN, violation of SC VI.1/R336.1213(3) and Rule 336.1301

The company disagrees that a violation occurred. As per our conversation on October 26, 2018, the resolution is to change the permit monitoring condition. The company agrees and with three ROP documents currently pending it seems this is an appropriate time for the update to the monitoring language.:

Thank you for your assistance in this matter. If you have additional questions regarding the event or this response, please contact me at (989) 686-0161 x 2236.

Sincerely,



Steven Smock, Environmental Manager

cc: C. Hare
K. Scheffler
J. Pfof

DEQ-AQD

OCT 29 2018

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