

April 16, 2019

DEQ-AQD

APR 18 2019

SAGINAW BAY

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
April 4, 2019, SRN B1493 – Sebewaing Factory

Dear Mr. Karl

Michigan Sugar Company (MSC) is in receipt of the above referenced Violation Notice (VN) dated April 4, 2019, which alleges that Michigan Sugar failed to submit a semi-annual deviation report for its Sebewaing Factory to the AQD district office by March 15, 2019 consistent with the requirements of its ROP. MSC is somewhat confused by the VN. Since the receipt of the VN, MSC has reviewed its records and discussed this issue with relevant staff, and is convinced that the semi-annual deviation report was sent to the agency via U.S. Mail on March 15, 2019. In fact, Adam Gennrich (Factory Chemist) reports that he generated the semi-annual deviation report on March 15, 2019 prior to submittal. A copy of the screen shot of the computer directory showing the last date that the file was modified (March 15, 2019) is attached. Adam did not send the report via certified mail; however, he personally delivered the report to the Sebewaing post office on March 15, 2019 and he asked to observe the letter being post-marked by the U.S. Post Office official present. Adam is personally familiar with the U.S. Post Office Official who was present at the time (Laura Nimitz) and believes that she will likely recall his request to observe the document being post-marked. Adam Gennrich is willing to execute an Affidavit verifying the statements above.

Based on the foregoing, MSC believes that the semi-annual deviation report was properly submitted to the MDEQ consistent with requirements of its permit. On at least prior occasion, the MDEQ has misplaced a semi-annual deviation report that was submitted by MSC (or at least failed to timely route it to the appropriate official). We respectfully request that the MDEQ review its files in an attempt to locate the documents submitted. In the meantime, consistent with the request contained in the VN, MSC has attached a copy of the semi-annual deviation report hereto.

Thank you for your assistance in this matter, please contact Steve Smock (989/686-1549 ext. 2236) with any questions or comments.

Sincerely,



Steven Smock, Environmental Manager

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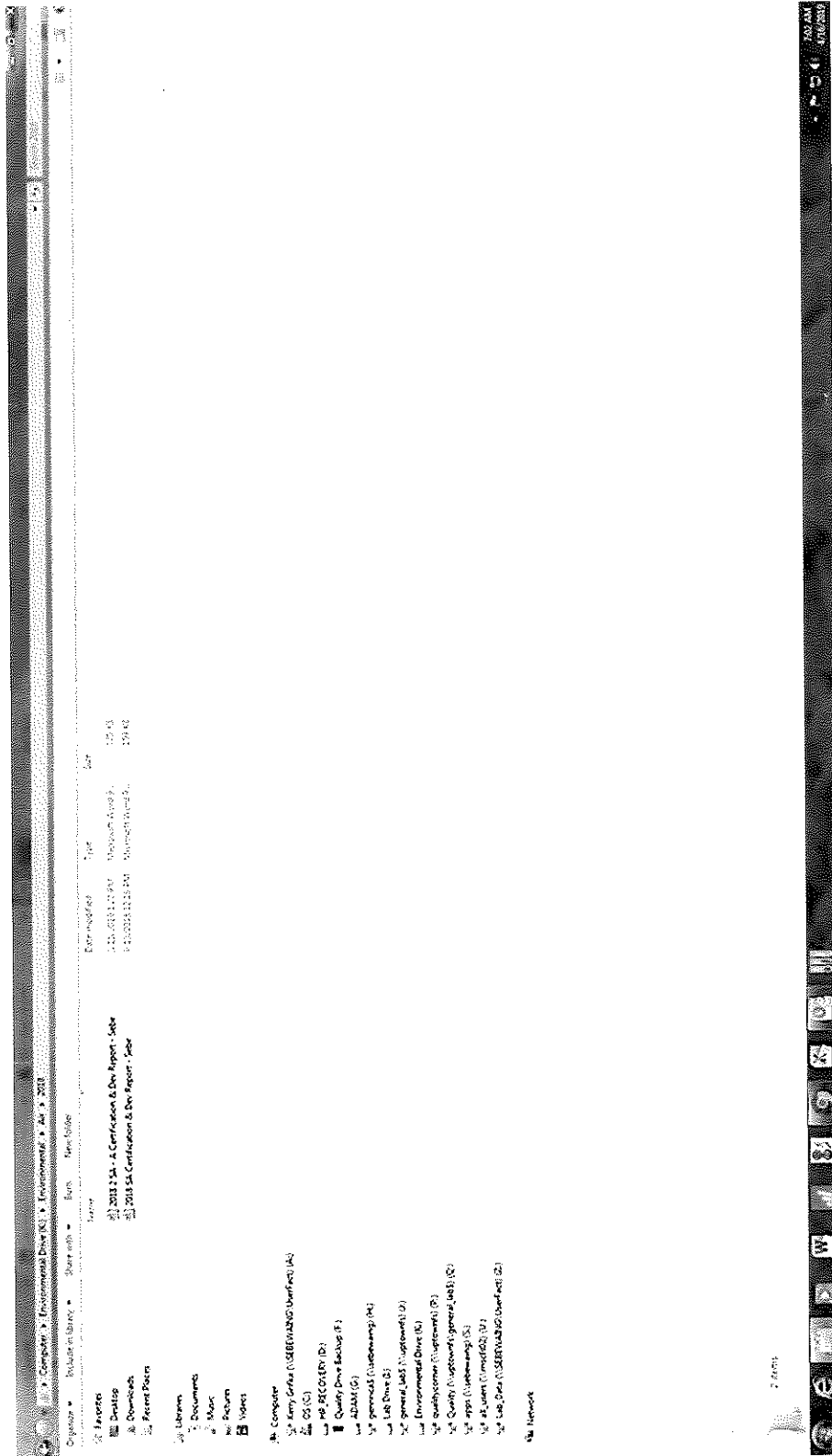
cc: C. Hare, DEQ (electronic)
K. Scheffler
A. Gennrich
J. Lowry

Enclosures

Screen shot

Copy of MSC-Sebewaing (SRN: B2873) 2018 Annual and Semi-annual Report
Certification and Deviation Reports

Screen Shot of Adam Gennrich's computer showing last saved date of 2018 annual and semi-annual deviation and certification report



Kelly Scheffler
Factory Manager

Electronic & US Mail

March 15, 2019

Matthew Karl
DNRE-AQD
401 Ketchum St., Suite B
Bay City, MI 48708

Re: 2018 Semi-Annual ROP Deviation Report
(ROP No. MI-ROP-B2873- 2012)

Dear Mr. Karl

Enclosed is the 2018 Annual and Second Semi-Annual Deviation Report and associated Certification Report for the **Michigan Sugar Company – Sebewaing Factory** as per the air permit MI-ROP-B2873- 2012.

As always, Michigan Sugar Company strives to comply with all environmental issues, including education and community involvement. We work very hard to help MDEQ promote a cleaner environment for the future of the Great Lakes Region and look forward to continuing our productive relationship with MDEQ.

If there are any further concerns, please feel free to contact me at any time.

Sincerely,

Kelly Scheffler



cc: S. Smock
A. Gennrich



SEBEWAING FACTORY OFFICE
947 Pine Street
Sebewaing, Michigan 48759
Telephone (989) 883-3201 – Fax (989) 883-9111





MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

DEQ-AQD

APR 18 2019

**RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION**

SAGINAW BAY

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Michigan Sugar Company - Sebewaing County Huron

Source Address 763 N. Beck Street City Sebewaing

AQD Source ID (SRN) B2873 ROP No. MI-ROP-B2873- 2012 ROP Section No. 1

Please check the appropriate box(es):

Annual Compliance Certification (Pursuant to Rule 213(4)(c))

Reporting period (provide inclusive dates): From January 1, 2018 To December 31, 2018

1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.

2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))

Reporting period (provide inclusive dates): From July 1, 2018 To December 31, 2018

1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

Other Report Certification

Reporting period (provide inclusive dates): From January 1, 2018 To December 31, 2018

Additional monitoring reports or other applicable documents required by the ROP are attached as described:
Jan 2018 to December 2018 Compliance Assurance Monitoring (CAM) Excursion/Exceedance And Downtime Summary Report

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

<u>Kelly Scheffler</u>	<u>Factory Manager</u>	<u>989-883-3201</u>
Name of Responsible Official (print or type)	Title	Phone Number
		<u>3/15/19</u>
Signature of Responsible Official		Date

* Photocopy this form as needed.



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
DEVIATION REPORT**

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

This form may be submitted in conjunction with the Renewable Operating Permit Report Certification form (EQP 5736) to report deviations from all general conditions and special conditions in the Renewable Operating (RO) Permit for which deviations required to be reported by Rule 213(3)(c) have occurred. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as described in General Condition No. 22 in the RO Permit and be made available to the Department of Environmental Quality, Air Quality Division, upon request. Items 1 - 8 must be completed for all deviations being reported.

Source Name Michigan Sugar Company County Huron

Source Address 763 North Beck Street City Sebewaing

AQD Source ID (SRN) B2873 RO Permit No. MI-ROP-B2873- 2012 RO Permit Section No. 1

RO Permit Section Contact Kelly Scheffler Contact Phone No. 989-883-3201

Reporting Period (provide inclusive dates): From July 1, 2018 to December 31, 2018

Report Type: Annual Semi Annual Other (Describe) _____

1. Group or Source Wide ID EU-PULPDRYER#2	2. Table/Condition No. VI.2	3. Date(s) of Occurrence 10/1/18, 10/3/18	4. Previously reported ? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes, Date	5. Duration of Deviation Hours(respectively) : 9,12
6. Method Used to Determine Compliance Status (if different from method specified in RO Permit)		7. Description of Deviation FGR flowrate was unavailable during the time period due to a mechanical issue.		
8. Reason for Deviation and Description of Corrective Action Taken Repairs were made to the instrument and the instrument was returned to service as quickly as possible. Training will be given to the Dryer Operators on the importance of these readings and expected actions to be taken when the instrument is out of service.				

1. Group or Source Wide ID FG-BOILERS	2. Table/Condition No. VI.3.	3. Date(s) of Occurrence 9/1/18, 9/10/18, 9/11/18, 9/22/18, 9/24/18, 9/25/18, 9/26/18, 9/28/18, 10/7/18, 11/9/18, 11/11/18	4. Previously reported ? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes, Date	5. Duration of Deviation 2, 1, 1, 2, 6, 11, 3, 1, 1, 2, 1 hours respectively
6. Method Used to Determine Compliance Status (if different from method specified in RO Permit)		7. Description of Deviation Pressure Drop Low Reading for Wet Scrubber Venturi.		
9. Reason for Deviation and Description of Corrective Action Taken Low pressure reading. Believe issue is related to plugging and moisture in pressure sensor lines. All other parameters indicate stable operation. Cleaning resolved issue.				

