

March 20, 2023

CERTIFIED MAIL

Mr. Chris Hare
District Supervisor
EGLE-Air Quality Division
401 Ketchum St., Suite B
Bay City, MI 48708

CERTIFIED MAIL

Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE-AQD
P.O. Bo 30260
Lansing, MI 48909-7760

Subject: Response to VN 20230228 Dated February 28, 2023
Michigan Sugar Company – Sebewaing Factory

Dear Mr. Hare and Ms. Camilleri,

Michigan Sugar Company (MSC) respectfully submits this response to the February 28, 2023, Violation Notice (VN) issued by the Michigan Department of Environment, Great Lakes, and Energy (EGLE).

The Coal fired Boilers #2 (EUWICKESEASTBOILER) and #3 (EUWICKESWESTBOILER) located at the Michigan Sugar Company's Sebewaing Factory, failed to meet the Carbon Monoxide (CO) emission limit (FG_STOKERBLRS-5D S.C. I.4.) during the performance test conducted on December 7-8, 2023.

Since receiving the Performance Testing Results Report from Network Environmental Inc., the factory has taken the following actions to identify and rectify the root cause of the emission limit exceedance.

- Facility has conducted independent reviews of both Boiler #2 and #3 and found that only boiler #2 seems to be having issues.
- Coordinated inspections and service of equipment by experienced contractors including Detroit Stoker and Caldera Control.
- The facility has increased the load on the CE package boiler (which has been operating consistent with permit requirements), in order to reduce the load on Boiler #2.
- Shut down both boilers to clear and clean out the stoker bed grates and inspect for damage.
- Retained Detroit Stoker to troubleshoot and tune boiler #2. They have been on-site a total of five different times for 2-4 days each trip.
- Adjusted underfire air to improve air flow on Boiler #2 per Detroit Stoker Company.
- Inspected under fire air fan.
- Entered boiler under air flow trenches to inspect for blockages or leaks to firebox.
- Internal inspection of fire box for excessive ash being flushed from flume on the west side and boiler under fire air flow issues.
- Internal entry into boiler to inspect and repair bed seals.
- Brought in American Instrumentation, Inc. as a second set of eyes.
- Contacted Caldaria Controls to complete on-site visit. Due to availability, this will occur in April.
- Again, cleaned boiler bed off to inspect for any repairs that may be needed.

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MAR 27 2023

Bay City

Page 2

Michigan Sugar Company personnel are reviewing all options to bring boiler #2 into compliance. At the same time, we are also looking at all potential back-up scenarios and identifying the feasibility each.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Meaghan Martuch". The signature is written in a cursive, flowing style.

Meaghan Martuch
Air Compliance Manager
Michigan Sugar Company
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