

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Michigan Sugar Company, Caro Factory	<b>SRN :</b> B2875
<b>Location :</b> 819 Peninsular St.	<b>District :</b> Bay City
	<b>County :</b> TUSCOLA
<b>City :</b> CARO <b>State:</b> MI <b>Zip Code :</b> 48723	<b>Compliance Status :</b> Non Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Adam Shaffer
<b>FCE Begin Date :</b> 6/15/2020	<b>FCE Completion Date :</b> 6/15/2021
<b>Comments :</b> 2021 FCE Report	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
06/15/2021	CO/CJ	Unknown	A Force Majeure, dated August 17, 2020, was submitted to the AQD regarding missing environmental records due to an employee that no longer works for the company.
06/15/2021	Excess Emissions (CEM)	Compliance	A summary report regarding the gaseous excess emission and monitoring system performance for EUBOILER4 was submitted by Michigan Sugar Company Caro Facility, per MI-ROP-B2875-2019. This report is for the first quarter of 2021. Based on a review by the AQD Technical Programs Unit, the report appears acceptable. (AShaffer, 06/15/21)
06/10/2021	ROP Annual Cert	Non Compliance	As required by MI-ROP-B2875-2019, an Annual Compliance Report was submitted and received by the AQD on March 11, 2021. The reporting time period was 01/01/21 through 12/31/21. During this time period five deviations were reported. A violation notice will be issued for the hours of operation limit exceedance for EUPULPDRYER and the lack of records for FG2KILNS. (AShaffer, 06/10/21)

Activity Date	Activity Type	Compliance Status	Comments
06/10/2021	ROP SEMI 2 CERT	Non Compliance	As required by MI-ROP-B2875-2019, a Semi-Annual Compliance Report was submitted and received by the AQD on March 11, 2021. The reporting time period was 07/01/21 through 12/31/21. During this time period three deviations were reported. A violation notice will be issued for the hours of operation limit exceedance for EUPULPDRYER and the lack of records for FG2KILNS. (AShaffer, 06/10/21)
05/11/2021	MAERS	Compliance	As required by MI-ROP-B2875-2019, a MAERS Report Certification was submitted for the 2020 MAERS Report. The 2020 MAERS Report Certification was received on time and concluded to be acceptable. (AShaffer, 03/30/21) As required by MI-ROP-B2875-2019, the supplemental control template information was submitted by Michigan Sugar Company on 04/12/21. The 2020 MAERS Report was determined to be acceptable after speaking with the company / consultant on several areas and changes made to emissions for EUPULPDRYER. (AShaffer 05/11/21)
03/30/2021	CAM Excursions/Exceedances	Compliance	As required by MI-ROP-B2875-2019, a CAM Excursion / Exceedance Report was submitted to the AQD. The reporting time periods were 07/01/2020 through 12/31/2020. No excursions / exceedances were reported. The CAM Excursion / Exceedance Report was received on time and concluded to be acceptable. (AShaffer, 03/30/21)
03/30/2021	CAM monitor downtime	Compliance	As required by MI-ROP-B2875-2019, a CAM Monitor Downtime Report was submitted to the AQD. The reporting time periods were 07/01/2020 through 12/31/2020. During this time period no monitoring downtime events occurred. The CAM Monitoring Downtime Report was received on time and concluded to be acceptable. (AShaffer, 03/30/21)
03/10/2021	On-site Inspection	Non Compliance	Scheduled announced inspection.

Activity Date	Activity Type	Compliance Status	Comments
12/04/2020	Excess Emissions (CEM)	Compliance	Third quarter operating report and CEM summary report
10/22/2020	ROP Semi 1 Cert	Compliance	<ul style="list-style-type: none"> <li>• Cylinder Gas Audit (CGA) was not performed during the 9 days of operation in the second quarter. First quarter CGA was performed 3-26-20 and EUBOILER4 was to shut down 4-9-20. It only operated 9 days in second quarter. MSC spoke w/TPU, given short time between 1st quarter audit and shutdown, TPU agreed that MSC should perform CGA soon after restart. Performed 8-20-20, 7 days after start-up. Method 9 certification documentation for one reading cannot be located.</li> </ul>
10/21/2020	ROP Other	Compliance	Cylinder Gas Audit for Boiler #4 NOx CEMS were -1.10% accuracy for the high NOx gas and 0.19% for the low gas. The average accuracy for the NOx monitor was -0.46%.
10/21/2020	ROP Other	Compliance	Cylinder Gas Audit for Boiler #4 NOx CEMS were -2.20% accuracy for the high O2 and -0.75% for the low O2. The average accuracy for the O2 monitor was -1.48%.

Name: Adam Shaffer Date: 06/15/2021

Supervisor: Chris Hare