



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



DAN WYANT  
DIRECTOR

October 17, 2014

Mr. David Noble  
Michigan Sugar Company  
2600 South Euclid Avenue  
Bay City, MI 48706

SRN: B2875, Tuscola County

Dear Mr. Noble:

**VIOLATION NOTICE**

On September 25, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a joint site visit with District Water Division Staff at the Michigan Sugar Company-Caro Plant located at 819 Peninsular Street, Caro, Michigan. The purpose of this inspection was to determine the status of a permitted relocation of a natural gas boiler permitted for installation at the facility, and compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules and the conditions of Permit to Install (PTI) number 44-14.

During the joint site visit, AQD District Staff noted that EUBOILER4, permitted under the above referenced boiler was in operation, and may have been in violation of the following:

Process Description	Rule/Permit Condition Violated	Comments
Natural Gas Fired Boiler #4	EUBOILER4, SC III.1	Late submittal of MAP due 90 days after permit issuance (June 12, 2014)
Natural Gas Fired Boiler #4	FG-63-FD-EXGAS1BOILER, SC VII.3	Initial Notification of Start-up due 15 days after start up

The above violations were verified based on an Initial Notification Form submitted on October 2, 2014 (received October 3, 2014) which indicated a startup date of September 12, 2014. In addition to the Initial Notification Form submitted for EUBOILER4, the submittal included a copy of a MAP, Start-up and Shut-down Plan, and NOx/O2 Monitoring Plan for the emission unit. Review of these documents will be addressed in separate correspondence.

Based on the October 2, 2014 submittal, no further actions are necessary to correct the cited violations and a written response to this Violation Notice is not necessary. If Michigan Sugar Company believes the above observations or statements are

inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my site visit. If you have any questions regarding the violations please contact me at the number listed below.

Sincerely,

Handwritten signature of Sharon G. LeBlanc in black ink, written in a cursive style.

Sharon G. LeBlanc  
Environmental Quality Analyst  
Air Quality Division  
989-894-6212

sgl/ai

cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Hare, DEQ  
Mr. William Gough, MSC  
Mr. Steve Smock, MSC