



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
BAY CITY DISTRICT OFFICE



DANIEL EICHINGER
ACTING DIRECTOR

February 28, 2023

VIA EMAIL ONLY

Kevin Romzek, Factory Manager
Michigan Sugar Company - Sebewaing Factory
763 North Beck Street
Sebewaing, Michigan 48759

SRN: B2873, Huron County

Dear Kevin Romzek:

VIOLATION NOTICE

On February 6, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a copy of the results of emissions testing conducted at Michigan Sugar Company - Sebewaing Factory (MSC) located at 763 North Beck Street, Sebewaing, Michigan. Testing of the two coal fired boilers had been conducted on December 7 and 8, 2022. The testing was conducted as the result of a violation notice sent September 7, 2022, in part, for missing testing deadlines. The requirements for testing were specified in Renewable Operating Permit (ROP) number MI-ROP-B2873-2019 under conditions FGSTOKERBLRS-5D, V.8.

The stack testing results indicate the following:

Process Description	Rule/Permit Condition Violated	Comments
Coal fired boilers 2 and 3	FG-STOKERBLRS-5D, Special Condition I.4, Carbon Monoxide limits: 160 ppmv, dry, corrected to 3% O ₂ , 3-run average OR 0.14 lb/MMBTU of steam output, 3-run average	Test results show carbon monoxide emissions of: 262.7 ppmv, dry, corrected to 3% O ₂ , 3- run average 0.178 lb/MMBTU of steam output, 3-run average

The boilers are subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. These standards are found in 40 CFR Part 63, Subpart DDDDD. The limits for carbon monoxide are 160 ppmv, dry, corrected to 3% O₂, 3-run average OR 0.14 lb/MMBTU of steam output, 3-run average. Both limits were exceeded.

Kevin Romzek
Michigan Sugar Company – Sebewaing Factory
Page 2
February 28, 2023

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 20, 2023, which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Michigan Sugar Company – Sebewaing Factory 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. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Ben Witkopp
Environmental Engineer
Air Quality Division
989-295-1612

cc: Meaghan Martuch, MSC
Nick Klein, MSC
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Chris Hare, EGLE