



GRETCHEN WHITMER  
GOVERNOR

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



DANIEL EICHINGER  
ACTING DIRECTOR

March 14, 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 January 31, 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 (MSC) - Sebewaing Factory located at 763 North Beck Street, Sebewaing, Michigan. Testing the pulp dryer operations had been conducted on November 29 and 30, 2022. The testing was conducted on pulp dryers 1, 2, and 3 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 FG-PULPDRYERS V.2 and EU-PULPDRYER#3 V.3.

The stack testing results indicate the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-PULPDRYERS (Pulp dryers 1 and 2 in MI-ROP-B2873-2019)	R 336.1201 (1)	Volatile Organic Compound (VOC) and Carbon Monoxide (CO) emissions were not evaluated / permitted for dryers 1 & 2. Test results from dryer 3 confirmed VOCs and CO from pulp drying.

The United States Environmental Protection Agency (USEPA) previously acted on MSC Sebewaing Factory's pulp dryer 3 related to prevention of significant deterioration (PSD) regulations concerning VOC and CO emissions. A result was the issuance of air use permit to install (PTI) 339-05A for pulp dryer 3 at MSC Sebewaing Factory, which added VOC and CO emission limits to the permit. Pulp dryer 3 had previously been permitted for only particulate matter and sulfur dioxide emissions. It seems the presence of VOC emissions resulting from the beet pulp itself during the drying process was previously unknown to the industry as well as regulatory agencies.

Kevin Romzek  
Michigan Sugar Company – Sebewaing Factory  
Page 2  
March 14, 2023

However, after this permitting process, MSC did not initiate any permitting action for dryers 1 and 2 at Sebewaing, nor the pulp dryers at MSC Caro or Croswell facilities. The lack of addressing VOC and CO emissions from the pulp dyers at these locations results in a violation of State of Michigan air quality rule R 336.1201, also known as Rule 201.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 4, 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 MSC Sebewaing 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