

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Michigan Sugar Company, Caro Factory	SRN : B2875
Location : 819 Peninsular St.	District : Bay City
	County : TUSCOLA
City : CARO State: MI Zip Code : 48723	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Nathanael Gentle
FCE Begin Date : 2/1/2022	FCE Completion Date : 2/3/2023
Comments : FY23 FCE Report. EUPULPDRYER violations for PM emissions exceedances and incomplete PM10 emission rate verification are still working to be resolved.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
02/03/2023	Stack Test	Non Compliance	EU-PULPDRYER Results from stack test completed on 12/1/2022 for PM emissions. Results showed exceedances for the emission limits of 0.10 pound per 1,000 pounds of exhaust gases and 27.7 pph. In addition verification of PM10 emission rates was not completed. Results: 0.149 lbs/1000 lbs (Limit 0.10 lbs/1000 pounds of exhaust gas) 37.70 pph (Limit 27.7 pph) A VN was issued on January 25, 2023 following the facility providing a digital copy of the results on January 24, 2023.
02/02/2023	CEM RATA	Compliance	Boiler #4 CEMS RATA completed on 12/1/2022. Testing was completed by Network Environmental, Inc. The relative accuracy for the NOx CEMS using lbs/MMBtu was 4.67% of the mean of the reference method samples.
02/01/2023	On-site Inspection	Non Compliance	FY23 Scheduled Inspection

Activity Date	Activity Type	Compliance Status	Comments
01/30/2023	Excess Emissions (CEM)	Compliance	<p>Fourth Quarter Excess Emission Monitoring system performance.</p> <p>EER for fourth quarter 2022. No excess emissions or monitor downtime reported for the reporting period.</p> <p>RATA was performed on 12/1/2022. Pursuant to Appendix 3 of the ROP and 40 CFR Part 60 Appendix F, Each CEMS must be audited at least once each calendar quarter. A CGA may be conducted three of the four quarters, with a RATA completed at least one of every four quarters.</p>
01/25/2023	Telephone Notes		Phone Conversation Discussing Results of 12/1/2022 Pulp Dryer Stack Test
01/20/2023	Excess Emissions (CEM)	Compliance	<p>The Second Quarter Cylinder Gas Audit was completed on April 6, 2022, for Boiler #4. Results for NOx show the CEMS were at a -0.31% accuracy for the high NOx gas and -2.38% for the low gas. The average accuracy for the NOx monitor was -1.35%. The results for the O2 showed a -2.48% accuracy for the high O2 gas and -3.39% for the low gas. The average accuracy for the O2 monitor was -2.93%. The report was late and not submitted with the 60-day timeframe. After further review, the report was overall concluded to be acceptable at this time. (AShaffer, 01/20/23)</p>
01/20/2023	Excess Emissions (CEM)	Compliance	<p>A 2022 Quarterly Summary Report for Gaseous Excess Emission and Monitoring System Performance was submitted by Michigan Sugar Company, Caro Factory. After further review, the report appears acceptable at this time. (AShaffer, 01/20/23)</p>
12/01/2022	Stack Test Observation		Testing of EUPULPDRYER as required by S.C.V.1.

Activity Date	Activity Type	Compliance Status	Comments
11/04/2022	Excess Emissions (CEM)	Compliance	<p>Third Quarter CGA and Excess Emission Monitoring system performance.</p> <p>EER for third quarter 2022. No excess emissions or monitor downtime reported for the reporting period.</p> <p>Cylinder Gas Audit(CGA) completed. Pursuant to Appendix 3 of the ROP and 40 CFR Part 60 Appendix F, Each CEMS must be audited at least once each calendar quarter. A CGA may be conducted three of the four quarters, with a RATA completed at least one of every four quarters. A CGA uses known gas cylinder concentrations to assess the CEMS sensors.</p> <p>The CGA was completed on 9/4/2022 by Network Environmental, Inc. The high range NOx gas concentration used was 127 ppm. The low range NOx gas concentration used was 54.6 ppm. The CGA results for the NOx CEMS were -1.10% accuracy for the high NOx gas and -4.03% for the low gas. The average accuracy for the NOx monitor was -2.56%. The high range O2 gas concentration used was 12.0%. The low range O2 gas concentration used was 5.9%. The CEMS detected value was 5.8% for all three runs. The average accuracy for the O2 monitor was -1.68%. The CGA results for the O2 analyzer were -1.67% accuracy for the high O2 gas and -1.69% for the low gas. The average accuracy for the O2 monitor was -1.68%. The control limit for CGA accuracy is plus or minus 15% of the average audit value or plus or minus ppm, whichever is greater.</p>

Activity Date	Activity Type	Compliance Status	Comments
10/18/2022	ROP Semi 1 Cert	Compliance	<p>Postmarked 9/14/22 Semi-Annual Report Certification 1/1/2022 to 6/30/2022. One deviation reported. A deviation report was included. EUBOILER4 SC VII. 4. The Quarterly CEMS report was due 30 days after the close of the quarter. The deviation report details that that the Quarterly CEMS report was completed on time, but a work process change caused confusion as to what documents needed to be submitted. The completed report and associated documents were submitted to EGLE via certified mail on 9/1/2022. Additionally, the facility reports a detailed SOP has been created documenting each item that must be submitted with the report and shared with factory personnel.</p> <p>A copy of the CAM excursion/exceedance summary report was included. No exceedances were reported to have occurred.</p> <p>A copy of the CAM Monitor Downtime Incident Summary Report Form was included. No downtime was reported to have occurred.</p>
10/18/2022	CAM Excursions/Exceedances	Compliance	<p>Postmarked 9/14/22 No exceedances or excursions reported Report was included with ROP Semiannual Cert. Report was submitted late on 9/1/2022 and not with the quarterly CEMS report.</p>
10/18/2022	CAM monitor downtime	Compliance	<p>Postmarked 9/14/22 No downtime reported Report was included with ROP Semiannual Cert. Report was submitted late on 9/1/2022 and not with the quarterly CEMS report.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/02/2022	Excess Emissions (CEM)	Compliance	<p>The First Quarter Cylinder Gas Audit was completed on February 23, 2022, for Boiler #4. Results for NOx show the CEMS were at a -3.07% accuracy for the high NOx gas and -4.03% for the low gas. The average accuracy for the NOx monitor was -3.55%. The results for the O2 showed a -1.65% accuracy for the high O2 gas and -3.39% for the low gas. The average accuracy for the O2 monitor was -2.52%. The report was late and not submitted with the 60-day timeframe. After further review, the report was overall concluded to be acceptable at this time. (AShaffer, 05/05/22)</p> <p>Update - The Summary Report for Gaseous Excess Emission and Monitoring System Performance was attached and not initially identified. Upon review the percent of emission exceedances and CEM system downtime during this time period was zero. (AShaffer, 05/26/22)</p>
04/15/2022	MACT (Part 63)	Compliance	<p>A Boiler MACT Compliance Report was submitted to and received by the AQD on March 15, 2022. Additionally, the report was submitted to CEDRI on March 15, 2022. The report is the five year compliance of both boilers onsite. Upon review, errors were noted, however, the report appears to overall be acceptable at this time. (AShaffer, 04/15/2022)</p>
03/28/2022	MAERS	Compliance	<p>As required by MI-ROP-B2875-2019, a MAERS Report Certification was submitted for the 2021 MAERS Report. The 2021 MAERS Report Certification was received on time and concluded to be acceptable. An update will be provided on the results of the audit. (AShaffer, 03/28/22)</p>

Activity Date	Activity Type	Compliance Status	Comments
03/28/2022	ROP Annual Cert	Compliance	As required by MI-ROP-B2875-2019, an Annual Compliance Report was submitted and received by the AQD on March 15, 2022. The reporting time period was 01/01/21 through 12/31/21. During this time period no deviations were reported. The report was received on time and properly certified. After speaking with company staff it was determined that Mr. Josh Taylor, Factory Manager, is now the new Responsible Official. It was verified that he meets the definition of Responsible Official and a minor mod would be submitted for the change. It should be noted that the Violation Notice, dated 06/16/21, was for violations that occurred in 2020; therefore, would not need to be noted in this deviation report. (AShaffer, 03/28/22)
03/28/2022	ROP SEMI 2 CERT	Compliance	As required by MI-ROP-B2875-2019, a Semi-Annual Compliance Report was submitted and received by the AQD on March 15, 2022. The reporting time period was 07/01/21 through 12/31/21. During this time period no deviations were reported. After speaking with company staff it was determined that Mr. Josh Taylor, Factory Manager, is now the new Responsible Official. It was verified that he meets the definition of Responsible Official and a minor mod would be submitted for the change. (AShaffer, 03/28/22)
03/28/2022	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 07/01/2021 through 12/31/2021. No excursions / exceedances were reported. The CAM Excursion / Exceedance Report was received on time and properly certified. (AShaffer, 03/28/21)

Activity Date	Activity Type	Compliance Status	Comments
03/28/2022	CAM monitor downtime	Compliance	<p>As required by MI-ROP-B2875-2019, a CAM Monitor Downtime Report was submitted to the AQD. The reporting time periods were 07/01/2021 through 12/31/2021. During this time period no monitoring downtime events occurred. The CAM Monitoring Downtime Report was received on time and properly certified. (AShaffer, 03/28/21)</p>

Name: Mathewson, Brent

Date: 3/28/2023

Supervisor: Chris Kane