

June 22, 2021

Michigan Department of Environment, Great Lakes and Energy
Air Quality Division
Bay City District
401 Ketchum Street, Suite B,
Bay City, Michigan 48708
CERTIFIED MAIL: XXXX-XXXXX-XXXXX

Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
P.O Box 30261,
Lansing MI 489009-7760
CERTIFIED MAIL: XXXX-XXXXX-XXXXX

RE: SRN B2875, Tuscola County Violation Notice dated June 16, 2021

Dear Mr. Schaffer,

I am writing on behalf of Michigan Sugar Company (MSC) in response to the June 16, 2021 Violation Notice (the "VN") issued by the Michigan Department of Environment, Great Lakes and Energy (EGLE), which alleged two (2) violations of MSC Renewable Operating Permit (ROP #MI-ROP-B2875-2019). Below are MSC's responses to each of the alleged violations set forth in the VN:

Alleged Violation: MI-ROP-B2875-2019, EUPULPDRYER, Special Condition (SC) III.2 violation:

The alleged violation occurred from 11-24-2020 – 12-31-2020. The alleged violation was the result of inadvertent operator error. The hours of operation are tracked via a PLC. A warning alert is set to trigger an operator response if operational limit is reached. Due to the location of the warning banner on the computer display, it was missed by MSC staff.

As of 6/22/2021, the following corrective and preventive actions have been implemented:

1. Prior to campaign start up, the Warning Alert Banner will be included in the upper portion of the computer display. This allows for it to be visible at all times.
2. EUPULPDRYER hours of operations has been added as a line item to the routine reports reviewed by responsible parties at Michigan Sugar Caro Factory.
3. Pre-campaign training for appropriate personnel has been added to ensure a proper response to a subsequent Warning Alert Banner.

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Alleged Violation: MI-ROP-B2875-2019, FG2KILNS, SC VI.2

MSC has not been able to locate the records of non-certified emissions checks performed from August 10 to August 13, 2020, while FG2KILN was venting to the atmosphere. However, it should be noted that MSC believes that the emissions checks were performed and that records were misplaced during the transition of its staff members.

As of 6/22/2021, the following corrective and preventive actions have been implemented:

1. MSC has ensured that there are multiple individuals certified to perform visual emission inspections and method 9 readings.
2. The facility implemented a document control and retention procedure which includes electronic (scanned) back-up of inspection documents (which are then stored on the facility server).
3. MSC has implemented internal procedures to ensure notification of appropriate staff when FGKIN is venting to the atmosphere.

If you have any questions, please feel free to contact me.

Sincerely,



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