

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

B287527412

FACILITY: Michigan Sugar Company, Caro Factory		SRN / ID: B2875
LOCATION: 819 Peninsular St., CARO		DISTRICT: Saginaw Bay
CITY: CARO		COUNTY: TUSCOLA
CONTACT: Steven Smock, environmental engineer		ACTIVITY DATE: 09/25/2014
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Toured facility with District Water Division Inspector as part of fiscal year NPDES related inspection.		
RESOLVED COMPLAINTS:		

On September 25, 2014, AQD District Staff accompanied District Water Division Staff on walk over of waste water treatment system. District Staff met with Steve Smock, Environmental Representative for the company. While onsite, Staff noted that the pulp dryers were in operation, and that VEs for a 6 minute monitoring period were < 10 % opacity.

No VEs were noted from either of the two boiler stacks. Upon questioning, Mr. Smock confirmed that the facility had installed the Natural Gas Boiler from Michigan Sugar Company Bay City Michigan Facility. The NG boiler (EUBoiler#4) replaces the two coal-fired wickes boilers previously used by the facility. The wickes boilers have been removed from site. CEMS for the NG boiler have been installed, with the probes for the units installed in some horizontal ducts that run from the emission unit to the appropriate stack. When questioned, the unit was reported to not have been operated at more than 50 % of maximum capacity at that point, and was being operated along with the "summer boiler" to serve the facility.

During the waste water treatment pond tour, Mr. Smock reported that the only waters that are discharged come from one pond in the system, and they contain waters that have gone thru the steam process. Waters from the settling or mud ponds are reported to be piped back to the facility for use in the process.

A review of the permit associated with the new boiler (44-14) require the following:

- submittal of a MAP within 90 days of the permit issuance (June 12, 2014)
- notice within 30 days of completion of installation, construction, reconstruction, relocation, or modification....completion of those activities is consider to occur no later than the commencement of trial operation. (startup for facility was reported to be on or around September 12, 2014)
- Notification of actual start-up of a relocated boiler or process heater delivered or postmarked within 15 calendar days after that date.
- Within 30 days after commencement of trial operation, the permittee shall submit two copies of a monitoring plan for the CEMS.

Conservatively it would appear that the facility could argue that they are in a period of trial operation, as they have not yet achieved operation at maximum capacity. Based on that assumption the facility would be in violation of all four permit requirements by October 12, 2104. If the appropriate submittals are not received by that date, and initiation of trial operation is confirmed to be September 12, 2014. Then a Notice of Violation will be issued for all appropriate permit conditions. sgl

NAME Sharon LeBlanc DATE 10/1/2014 SUPERVISOR C. [Signature]