



GRETCHEN WHITMER
GOVERNOR

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

EGLE
LIESL EICHLER CLARK
DIRECTOR

June 16, 2021

Mr. Kevin Romzek
Michigan Sugar Company - Caro Facility
819 Peninsular Street
Caro, Michigan 48723

SRN: B2875, Tuscola County

Dear Mr. Romzek:

VIOLATION NOTICE

On February 19, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), requested records pertaining to Renewable Operating Permit (ROP) number MI-ROP-B2875-2019, and on March 10, 2021, conducted an inspection of Michigan Sugar Company - Caro Facility (MSC Caro) located at 819 Peninsular Street, Caro, Michigan. The purpose of the records request and inspection was to determine MSC Caro's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of ROP No. MI-ROP-B2875-2019.

Based on the records request and inspection, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPULPDRYER	MI-ROP-B2875-2019, EUPULPDRYER, Special Condition (SC) III.2	Exceeding the yearly hours of operation limit
FG2KILNS	MI-ROP-B2875-2019, FG2KILNS, SC VI.2	Not keeping adequate records.

During the 2020 fiscal year, MSC Caro exceeded the 4,000-hour operational limit for the EUPULPDRYER. MSC Caro exceeded the 4,000-hour operation limit on November 24, 2020. The total hours operated in 2020 were 4,851. The hours of operation limit exceedance is a violation of ROP No. MI-ROP-B2875-2019, EUPULPDRYER, SC III.2.

The dates, times, and durations when FG2KILN was venting to the atmosphere were provided for select time periods; however, records were not available of non-certified visible emission checks and if any visible emissions were observed, were Method 9 readings completed and / or any corrective actions taken. This is a violation per ROP No. MI-ROP-B2875-2019, FG2KILNS, SC VI.2.

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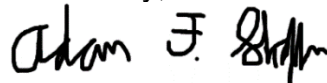
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 7, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the 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 Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If MSC Caro 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 and for the cooperation that was extended to me during my inspection of Michigan Sugar Company - Caro Facility. 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,



Adam Shaffer
Environmental Quality Analyst
Air Quality Division
989-225-4789

cc: Mr. Jason Lowry, MSC
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Chris Hare, EGLE