



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

January 25, 2023

VIA EMAIL ONLY

Joshua Taylor
Michigan Sugar Company, Caro Factory
819 Peninsular Street
Caro, Michigan 48723

SRN: B2875, Tuscola County

Dear Joshua Taylor:

VIOLATION NOTICE

On December 1, 2022, Michigan Sugar Company - Caro Factory (MSC Caro) conducted particulate emission sampling on EUPULPDRYER. The purpose of the emission sampling 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 Renewable Operating Permit (ROP) number MI-ROP-B2875-2019a.

A copy of the particulate emission sampling results was provided to the AQD on January 24, 2023. Upon review of the stack sampling results, EGLE AQD alleges the following violations.

Process Description	Rule/Permit Condition Violated	Comments
EUPULPDRYER	Special Condition (S.C.) I.1	Exceedance of the particulate matter (PM) emission limit of 0.10 pound per 1,000 pounds of exhaust gases. Stack test results provided show an average concentration of 0.149 lbs / 1000 lbs.
EUPULPDRYER	S.C. I.2	Exceedance of the PM emission limit of 27.7 pph. Stack test results provided show an average mass emission rate of 37.70 pph.

EUPULPDRYER	S.C. V.1	The permittee shall verify PM and PM10 emission rates from EUPULPDRYER. Emission testing results provided do not include PM10 emission rates.
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On December 1, 2022, a stack test was conducted which indicated that emissions from MSC Caro’s EUPULPDRYER exceeded the allowable emission rates specified in Rule 331 of the administrative rules promulgated under Act 451, Table 31 (and Special Conditions (SC) I.1 and I.2 of MI-ROP-B2875-2019a).

The allowed maximum emission rates of particulate matter is 0.10 pounds particulate per 1,000 pounds of exhaust gas and 27.7 pounds per hour. However, actual emissions were recorded to be 0.149 pounds particulate per 1,000 pounds of exhaust gas and 37.70 pounds per hour.

This constitutes a violation of Rule 331, which prohibits emissions of particulate matter from any process or process equipment in excess of the maximum allowable emission rate listed in Table 31 or specified as a condition of an air use permit.

Additionally, SC V.1 establishes the permittee shall verify PM and PM10 emission rates from EUPULPDRYER. Records provided did not include PM10 emission results.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 15, 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 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.

Joshua Taylor
Michigan Sugar Company – Caro Factory
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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,

A handwritten signature in black ink that reads "Nathanael Gentle". The signature is written in a cursive style with a large, stylized 'N' and 'G'.

Nathanael Gentle
Environmental Quality Analyst
Air Quality Division
989-778-0025

cc: Meaghan Martuch, MSC
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Chris Hare, EGLE