

September 28, 2022

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Ms. Jenine Camilleri  
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Subject: Response to VN 20220907 Dated September 07, 2022  
Michigan Sugar Company – Sebewaing Factory

Dear:

Michigan Sugar Company (MSC) respectfully submits this response to the September 7, 2022 Violation Notice (VN) issued by the Michigan Department of Environment, Great Lakes and Energy (EGLE). In that VN, EGLE alleged violations to 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 the Renewable Operating Permit (ROP) number MI-ROP-B2873-2019.

In the VN, EGLE requests MSC to submit a written response, including the specific information listed below for each cited violation;

1. The dates the violations occurred
2. Explanation of the causes and duration of the violations
3. Whether the violations are on-going
4. Summary of actions that have been taken/proposed to correct the violations and dates the actions will take place.
5. What steps are being taken to prevent reoccurrence

MSC offers the following responses to address the alleged violations set forth in the VN (which are repeated below for ease of reference):

- **Pulp dryers 1 and 2 FG-PULPDRYERS, Special Condition (SC) V.2 Stack testing not conducted on dryers 1 and 2. Supposed to be done within 5 years from last test.**
  1. February 1, 2022
  2. MSC misunderstood the deadlines for the required testing.
  3. MSC is working with its contractors to schedule a stack test at its earliest opportunity to correct the alleged violation.
  4. MSC is working with its contractors to schedule a stack test at its earliest opportunity.
  5. A complete schedule for stack testing on all equipment with recurrence requirements has been created and is being utilized by environmental personnel to manager scheduling of stack tests.
- **Pulp dryer 3 EU-DRYER#3, SC V.2**

**Stack testing not conducted. Supposed to be done within 5 years from last test.**

1. February 1, 2022
  2. MSC misunderstood the deadline for the required testing.
  3. MSC is working with its contractors to schedule a stack test at its earliest opportunity to correct the alleged violation.
  4. MSC is working with its contractors to schedule a stack test at its earliest opportunity.
  5. A complete schedule for stack testing on all equipment with recurrence requirements has been created and is being utilized by environmental personnel to manager scheduling of stack tests.
- **Coal fired Boilers 2 and 3 FG-STOKERBLRS-5D SC V.8 and 40 CFR 63.7515(b) Stack testing for filterable PM and CO not conducted. Supposed to be done within 37 months from last test.**
    1. January 17, 2022
    2. MSC misunderstood the deadline for the required testing.
    3. MSC is working with its contractors to schedule a stack test at its earliest opportunity to correct the alleged violation.
    4. MSC is working with its contractors to schedule a stack test at its earliest opportunity.
    5. A complete schedule for stack testing on all equipment with recurrence requirements has been created and is being utilized by environmental personnel to manager scheduling of stack tests.
  - **MSC is responding the following alleged violations concurrently since all such violations are the result of the same root cause (failure to conduct stack testing).**
    - **Coal fired Boilers 2 and 3 40 CFR 63.7510(a)(2)**  
**Operating limited were not established for initial compliance purposes.**
    - **40 CFR 63.7520 and Subpart DDDDD, Appendix Table 7**  
**Operating Limits for oxygen level (for O2 system), boiler operating load, wet scrubber, and electrostatic precipitator were not established in conjunction with stack testing.**
    - **40 CFR 63.7520 and Subpart DDDDD, Appendix Table 8**  
**Operating limits not used for boiler operating load, wet scrubber, and electrostatic precipitator.**
    - **40 CFR 63.7525(a)(7)**  
**Oxygen level not used as an operating parameter for O2 trim system.**
    1. January 17, 2022
    2. MSC misunderstood the deadlines for required stack testing. Because the stack testing was not completed, MSC could not set new operating limits or comply with those limits. Notwithstanding the foregoing, the facility has maintained compliance with the previously established operating limits.
    3. MSC is working with its contractors to schedule a stack test at its earliest opportunity to correct the alleged violation.
    4. MSC is working with its contractors to schedule a stack test at its earliest opportunity.
    5. A complete schedule for stack testing on all equipment with recurrence requirements has been created and is being utilized by environmental personnel to manager scheduling of stack tests.
  - **FG-STOKERBLRS-5D SC VII.19.c. and 40 CFR 63.7550( c)(3)**

**Operating parameter limitations, startups shutdowns etc, not included in compliance reports**

1. January 17, 2022
2. MSC misunderstood the deadlines for required stack testing
3. MSC is working with its contractors to schedule a stack test at its earliest opportunity to correct the alleged violations and to allow for the completion of the requested documentation.
4. MSC is working with its contractors to schedule a stack test at its earliest opportunity.
5. A complete schedule for stack testing on all equipment with recurrence requirements has been created and is being utilized by environmental personnel to manager scheduling of stack tests.

• **40 CFR 63.9(h)**

**Notification of compliance status not provided.**

1. January 17, 2022
2. A notice of Compliance Status was not provided because the stack testing necessary to establish compliance had not been completed.
3. MSC is working with its contractors to schedule a stack test at its earliest opportunity to correct the alleged violations and to allow for the completion of the requested documentation.
4. MSC is working with its contractors to schedule a stack test at its earliest opportunity.
5. A complete schedule for stack testing on all equipment with recurrence requirements has been created and is being utilized by environmental personnel to manager scheduling of stack tests.

• **Summer Boiler FG-NATGASBOILERS-5D, SC III.4.b and 40 CFR 63.7515(d)  
Tune-up not conducted. Supposed to be within 25 months of last one**

MSC believes that this citation was issued in error. ROP FG-NATGASBOILERS-5D, SC III.4.d provides that the tune must be conducted within 30 calendar days of start-up. MSC can also “Conduct the tune-up within 30 calendar days of startup, if the unit is not operating on the required date for a tune-up (40 CFR 63.7540(a)(13))” The summer boiler has not operated since 08/19/2021.

• **CE package boiler FG-NATGASBOILERS-5D, SC III.4.c and 40 CFR 63.7515(d)  
Tune up not conducted past 13 months of last one.**

1. April 18, 2021
2. MSC misunderstood the deadline for the required tune-up.
3. No. Tune up for 2022 was completed on 9/15/2022.
4. Tune up for 2022 was completed on 9/15/2022.
6. Tune up requirements are now included in the stack testing schedule that has been created and is being utilized by facility personnel.

Thank you for your assistance in this matter. If you have any questions or require further documentation, please feel free to contact me.

Sincerely,



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