



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREETHER
DIRECTOR

May 16, 2017

Mr. David Noble, V.P. Operations
Michigan Sugar Company
2600 South Euclid Avenue
Bay City, Michigan 48706

Dear Mr. Noble:

This letter is in reference to your Permit to Install (PTI) application identified as No. 21-15B (State Registration Number B2876) for an increase in the permitted burner size for the Riley Boiler located at 159 South Howard Street, Croswell, Michigan.

The public comment period ended on May 5, 2017. A public hearing was not requested, nor was one held. The Air Quality Division (AQD) received one comment letter during the comment period.

After careful consideration of the issues and pursuant to the delegation of authority from the Director of the Michigan Department of Environmental Quality (MDEQ), I have approved PTI No. 21-15B. As a part of this approval, we have revised two permit conditions to address certain information received during the public participation process and the subsequent analysis of that information.

The comment letter, received from the United States Environmental Protection Agency (USEPA), requested clarification of the phrase "satisfactory manner" as used in several conditions. In response to this comment, the AQD has added the following sentence to Special Condition (SC) SC III.1 for EU-RILEYBLR and SC III.1 for FGSUGAR:

"An approved MAP meets the requirement that the emission unit and the emission control equipment are installed, maintained, and operated in a satisfactory manner."

The USEPA also commented that in of lieu the term "test protocol" for the time period/operating scenario for several permit conditions, the actual averaging period should be listed. The conditions require Michigan Sugar Company to submit test plans to the AQD for approval prior to conducting actual emissions testing. In this way, the AQD ensures that the averaging time used in the emissions testing will correspond to the averaging time used to determine compliance with the emission limits. As such, the AQD did not make the requested changes. The MDEQ is however currently reevaluating including specific emission limit averaging times in permit conditions and flexible language that will address concerns of this type.

This approval is based upon and subject to compliance with all administrative rules of the MDEQ and conditions stipulated in the enclosed supplement. Please review these conditions thoroughly so that you may take the actions necessary to ensure compliance with all of these conditions.

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The equipment covered by this permit is also subject to the requirements of the Renewable Operating Permit Program. Submittal of the M-001 and C-001 forms may be required prior to commencing operation. A change that is subject to Rule 215 subrules (1), (2), or (3), promulgated pursuant to Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, requires the submittal of the forms to the appropriate AQD District Office. If a change is made pursuant to Rule 216, please submit the required forms to the Cadillac District Office at the address provided in the M-001 form instructions. Also, you must notify the Saginaw Bay District Office, in writing, within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of the process or process equipment covered by this PTI.

Additional information is included in the M-001 form instructions which are available on the Internet or can be obtained by contacting the Saginaw Bay District Office at 989-894-6200. The AQD permit web page is located at <http://www.michigan.gov/air>.

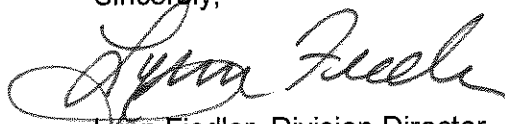
Also, PTI No. 21-15A has been voided because the equipment is now covered by PTI No. 21-15B.

To help us improve the service we provide our customers, we encourage you to complete a *Permit to Install Customer Service Survey* on the following Web page:

<https://www.surveymonkey.com/s/aqdptics>

If you have any questions regarding this permit, please contact Mr. David Riddle, AQD, Permit Section, at 517-284-6798; riddled@michigan.gov; or MDEQ, P.O. Box 30260, Lansing, Michigan 48909-7760; or you may contact me.

Sincerely,



Lynn Fiedler, Division Director
Air Quality Division
517-284-6773

Enclosures

cc/enc: Mayor Michael McMillan, City of Croswell
Mayor Mike Bradley, City of Sarnia
Ms. Denise McGuire, Sanilac County Clerk
Mr. Mike Moroney, Ministry of the Environment, Sarnia/Windsor District
Ms. Genevieve Damico, U.S. Environmental Protection Agency, Region 5
Mr. Constantine Blathras, U.S. Environmental Protection Agency, Region 5
Ms. Stephanie Diaz, U.S. Environmental Protection Agency, Region 5
Mr. Steven Smock, Michigan Sugar Company
Mr. Jeff Pfof, Environmental Partners, Inc.
Ms. Melody Kindraka, MDEQ
Mr. Chris Hare, MDEQ
Mr. David Riddle, MDEQ