

April 12, 2024

CERTIFIED MAIL
7020 1810 0002 1765 6488
Nathanael Gentle
EGLE, AQD, Bay City District,
401 Ketchum Street, Suite B
Bay City, MI 48708

CERTIFIED MAIL
7020 1810 0002 1765 6495
Jenine Camilleri
EGLE, AQD, Enforcement Unit Supervisor
P.O. Box 30260
Lansing, MI 48909-7760

Subject: Response to VN 20240325 Dated March 25, 2024
MI-ROP-B1493-2021
Michigan Sugar Company – Bay City Factory

Dear Mr. Gentle,

Michigan Sugar Company (MSC) respectfully submits this response to the March 25, 2024 Violation Notice (VN) issued by the Michigan Department of Environment, Great Lakes and Energy (EGLE). In that VN, EGLE cites violations to MI ROP-B1493-2021 regarding MSC's Boiler # 8 performance testing and Boiler #6 performance testing and communications.

In the VN, EGLE requests MSC to respond with specific actions to correct the cited violations and are provided below.

EUBOILER 8

Process Description	Rule/Permit Condition Violated	Comments
EUBOILER8	Special Condition (S.C.) V.2. The permittee shall verify the Carbon Monoxide and Nitrogen Oxide emission rate from EUBOILER8 within 24 months after issuance of ROP-MI-B1493-2021, and at a minimum, every five years from the date of the last test thereafter.	Verification of the Carbon Monoxide emission rate from EUBOILER8 was not completed within 24 months after issuance of ROP-MI-B1493-2021.

A Carbon Monoxide (CO) performance test was not included in the October 2, 2023, testing protocol letter provided by MSC, nor was it included in the approved test plan letter provided by EGLE on October 27, 2023. The omission of CO testing alongside the NOx testing that took place was an oversight.

MSC proposes to address this issue by scheduling CO testing for November 2024. While MSC could potentially test Boiler #8 sooner, MSC understands that the testing condition requires the factory to be operating at representative conditions. Since the campaign has ended for the season, much of the supported operation is effectively idled until the fall and will require ramping up once the next campaign commences. MSC and AQD can reevaluate this issue in the early fall, but MSC projects that Boiler #8 will resume representative operating conditions in November 2024.

FGBOILERS

Process Description	Rule/Permit Condition Violated	Comments
FGBOILERS	S.C. V.2. The permittee shall verify the Carbon Monoxide emission rate from FGBOILERS within 24 months after issuance of ROP-MI-B1493-2021, and at a minimum, every five years from the date of the last test thereafter.	Verification of the Carbon Monoxide emission rate from EUBOILER#6 in FGBOILERS was not completed within 24 months after issuance of ROP-MI-B1493-2021.

This testing was scheduled to occur prior to the 24-month deadline. On the day of testing, October 31, 2023, MSC and its vendors encountered inconsistencies between different instrumentation readings, which raised concerns with the instruments' accuracy and/or the boiler's operation. Given the need for testing under representative conditions, MSC conservatively opted to postpone testing. A third-party contractor was then contacted to schedule manual tuning of the boiler. During the manual tuning performed on November 13, 2023, adjustments were made to the oxygen trim system logic and tuning that confirmed proper operating conditions.

Performance testing was rescheduled for December 1, 2023. On the day of testing, MSC again encountered some issues that raised similar concerns. Specifically, MSC had concerns whether it could document the boiler was operating under representative conditions that result in maximum emissions. As a result, the test was again postponed pending further investigation.

Due to holidays and other required performance testing at separate MSC locations, the Boiler 6 performance testing was rescheduled for March 2024. The testing demonstrated compliance, but took place later than planned based on unanticipated complications during the earlier scheduled test dates.

Process Description	Rule/Permit Condition Violated	Comments
FGBOILERS	S.C. V.3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted.	Notifications of the time and place performance testing to verify the Carbon Monoxide emission rate for EUBOILER#6 on both November 30, 2023 and March 7, 2024 test dates were provided less than 30 days prior to the test dates.

FGBOILERS

Boiler #6 was originally included in the initial testing protocol sent to the agency on October 2, 2023, and the EGLE approval letter received by MSC on October 27, 2023. The requisite testing was scheduled for October 31, 2023. Due to operational issues as described above, the test was rescheduled twice. During those subsequent scheduled testing dates, the testing protocol that was approved in the initial notification (received on October 27, 2023) was not altered in any way. MSC did not believe that SC V.3 was applicable as this was not a "new" test but a change in testing date. MSC understands, however, that addition notice to AQD was warranted for the March 2024 retest. In the future MSC will ensure timely communication for scheduled testing dates, including rescheduled test dates.

If you have any questions or require further documentation, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Meaghan Martuch".

Meaghan Martuch
Air Compliance Manager
Michigan Sugar Company
Office: 989-686-0161, ext. 2236
Cell: 989-780-2550