



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

August 21, 2023

VIA EMAIL ONLY

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

SRN: B2875, Tuscola County

Dear Joshua Taylor:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a review of emissions reporting data submitted to the Michigan Air Emissions Reporting System (MAERS) for Michigan Sugar Company – Caro Factory (MSC – Caro) located at 819 Peninsular Street, Caro, Michigan.

During review of the emission reports, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPULPDRYER	Rule 336.1212(6)	Emissions of Carbon Monoxide (CO) and emissions of Volatile Organic Compounds (VOCs) from pulp drying while operating on natural gas are no longer reported for EUPULPDRYER.

Historically, MSC - Caro reported emissions of CO from pulp produced while operating on natural gas from EUPULPDRYER for calendar years 2005 through 2008. During this period, the CO emission basis was labeled as either stack test or other.

Additionally, emissions of VOCs from pulp produced while operating on natural gas for EUPULPDRYER were reported for calendar years 2005 through 2009. During this period, the VOC emission basis was labeled as either stack test or other.

The facility's cessation of reporting CO and VOC emissions from pulp produced while operating on natural gas from EUPULPDRYER is a violation of Rule 336.1212(6). Rule 336.1212(6), also known as Rule212(6), requires major sources to report the emissions, or the information necessary to determine the emissions, of each regulated air pollutant.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 11, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

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