

November 15, 2018

DEQ-AQD

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SAGINAW BAY

Department of Environmental Quality  
Air Quality Division  
401 Ketchum St., Suite B  
Bay City, MI 48708

Attention: Meg Sheenan, Environmental Quality Analyst

Regarding: Response to Violation Notice November 5, 2018  
Michigan Sugar Caro Factory, SRN: B2875

Dear Department:

Michigan Sugar Company is responding to the violation notice (VN) dated November 5, 2018. It is unknown when the visible emission survey sheet for Boiler #3 was discontinued. It is standard practice for all of the management staff to observe the roof line of the factory as they approach the site and building. Their observations include all emissions above the buildings as they are a good indicator of how the factory is operating. This does include the appearance of the boiler stacks. These observations are rarely documented.

A copy of the visible emissions survey log for Boiler #3 was provided to the boiler operator on November 9, 2018. Refresher training was given to the operator. Please also note we have been in contact with Chris Hare to discuss the 15% opacity trigger level. As we noted to Chris, one would require a Method 9 type reading in order to quantify the 15% action level requiring a Method 9 observation. We do not think this was the original intent of the Rule 213 monitoring provision, and as a result, we are seeking amended provisions that will equally provide a measure for determining compliance.

In the interim our operators will be making and recording the daily stack observations. As always, we will continue to cooperate with MDEQ on this and other air quality matters. If you have any questions or require additional information, please contact me.

Sincerely,



Steven Smock, Environmental Manager

Attachment

cc: J. Roszatycki  
J. Camilleri, DEQ