



May 21, 2020

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

Regarding: Response to Violation Notice April 29, 2020
Michigan Sugar - Caro Factory, SRN: B2875

Dear Mr. Hare,

Michigan Sugar Company (MSC) is responding to the violation notice (VN) dated April 29, 2020. As was reported in the second annual deviation report six-minute Method 9 observations were not conducted between the start of the operation of the lime kiln and the shut-down of the direct venting of the lime kilns. The recently re-issued air permit MI-ROP-B2875-2019 changed the visible emission survey language for the lime kiln (MI-ROP-B2875-2019-FGKILNS Special Condition VI.1a). This language change is currently the subject of a contested case with regard to two other permits held by MSC. Notwithstanding the foregoing, any non-compliance was inadvertent as MSC staff was monitoring emissions from the lime kilns by completing and logging daily visible emissions surveys consistent with the language of the previous permit. Furthermore, MSC has taken significant steps to prevent any future non-compliance by minimizing to the extent possible any direct venting from the lime kilns to reduce the need for Method 9 observations. Additionally, MSC has had additional employees complete Method 9 certification to allow it to conduct Method 9 observations as necessary to comply with the terms of the permit.

In the event that MSC is able to resolve the dispute regarding similar language in its pending contested case, MSC will likely request a similar permit modification to air permit MI-ROP-B2875-2019 for the sake consistency at all of its plants. In the meantime, MSC will make every effort to comply with this requirement. If you have any questions or require additional information, please contact me.

Sincerely,

Steven Smock, Environmental Manager

cc: M. Sheehan, DEQ (electronic)
K. Romzek
J. Lowry