



GRETCHEN WHITMER  
GOVERNOR

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

**EGLE**  
LIESL EICHLER CLARK  
DIRECTOR

April 29, 2020

Kevin Romzek  
Michigan Sugar Company - Caro Factory  
819 Peninsular Street  
Caro, Michigan 48723

SRN: B2875, Tuscola County

Dear Mr. Romzek:

**VIOLATION NOTICE**

On March 13, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the Semi-Annual Renewable Operating Permit Deviation Report from the Michigan Sugar Company (MSC) – Caro Factory located in Caro, Michigan. The report covered the reporting period of January 1, 2019 through December 31, 2019. The following deviation was included in the report.

Process Description	Rule/Permit Condition Violated	Comments
Two vertical kilns fired with coke or anthracite coal for the production of carbon dioxide and calcium oxide for purification of sugar juice.	MI-RQP-B2875-2019 FG2KILNS Special Condition VI.1.a.	MSC reported a deviation with this condition occurred once each day from September 8, 2019 to October 14, 2019. The required daily visible emissions check was not performed while the lime kilns were venting to the atmosphere.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 20, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: an explanation of the causes 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 recurrence.

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 Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. Please also submit an electronic response to SheehanM@Michigan.gov and CamilleriJ@Michigan.gov.

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If Michigan Sugar Company – Caro Factory 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 or email address listed below.

Sincerely,

A handwritten signature in black ink that reads "Meg Sheehan". The signature is written in a cursive style with a large, looped "M" and a long, sweeping "S".

Meg Sheehan  
Environmental Quality Analyst  
Air Quality Division  
989-439-5001  
SheehanM@Michigan.gov

cc: Mr. Steven Smock, MSC  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Chris Hare, EGLE