

February 19, 2018

Mr. Ben Witkopp and Mr. Chris Hare
MDEQ- Air Quality Division, Saginaw Bay District Office
401 Ketchum Street, Suite B
Bay City, Michigan 48708

Regarding: Violation Notice, January 30, 2018
Michigan Sugar Company, Croswell Factory
Croswell, Michigan, SRN B2876

Dear Messrs. Witkopp and Hare:

Michigan Sugar (the Company) is responding to the January 30, 2018 violation notice (VN) issued by the Michigan Department of Environmental Quality (the "MDEQ") to Michigan Sugar Company ("MSC" or the "Company"). The VN alleges MSC violated permitting requirements relating to the pulp dryer at its Croswell factory by: (1) emitting particulate matter in excess of permitted limits; and (2) failing to submit a complete test report to the MDEQ within 60 days following the last date of the test.

A stack test was performed by the Company on September 19, 2017; however, observed concentrations of particulate matter did not appear to be consistent with routine operations. As a result, MSC did not rely on the initial stack test and notified the MDEQ (through its consultants at EPI) of its intent to perform a second stack test to establish compliance. Meanwhile, MSC conducted an internal inspection to evaluate its operations. During that investigation it was determined that particulate matter emissions were higher than during routine operations due to a partial occlusion of the multi-clone system. MSC cleaned out the multi-clone unit to return the pulp dryer to routine operating conditions, and has implemented an increased maintenance schedule for the pulp dryer multi-clones to prevent any future occlusions.

While preparing to conduct the second stack test to establish compliance, a structural failure caused the separation chamber to fail on November 4, 2017. MSC immediately began repairs of the separation chamber and completed all such repairs of the structure on November 25, 2017 (the week of Thanksgiving). A stack test was performed on the pulp dryers on November 29, 2017, which established that particulate matter emissions from the pulp dryer were below permitted levels (specifically at 0.068 lbs./1000lbs of exhaust gas, which is approximately 70% of the permitted concentration). The November 29, 2017 stack test was performed six months prior to the expiration of the ROP (which expires on May 31, 2018) as

Mr. Ben Witkopp and Chris Hare, MDEQ-AQD
February 19, 2018
Page 2 of 2

required by the permit. The test report for the November 29, 2017 stack test was provided to the MDEQ on January 3, 2018, which was only 35 days after the stack test and within sixty days of the last date of the stack test. Because the November 29, 2018 stack test was provided to the agency within the appropriate timeline, MSC does not believe that it violated permit requirements to provide the stack test results within 60 days.

Based on the November 29, 2017 stack test results, there are no ongoing violations of the particulate matter emissions limit for the pulp dryer. MSC believes that any emissions in excess of the permitted limits for particulate matter for the pulp dryer would have ceased on the date that the clean-out of the multi-clone system was completed October 9, 2017.

Please feel free to contact me at (810) 679-2241 ext. 4422 or our consultant, Jeff Pfof at 616-218-8353 with any questions or comments you may have concerning this matter.

Sincerely,

Michigan Sugar Company



Ken Bennett
Factory Manager

cc: Steve Smock, Michigan Sugar Company
David Noble, Michigan Sugar Company
Jeff Pfof, EPI