

April 1, 2021

CERTIFIED MAIL & ELECTRONIC

Mr. Matt Karl
EGLE-AQD Technical Programs
Constitution Hall
525 West Allegan
P.O. Box 30473
Lansing, Michigan 48909-7973

DEQ-AQD
APR 5
~~MAR 29 2021~~
SAGINAW BAY

Regarding: Violation Notice March 12, 2021
Croswell Factory, SRN B2876

Dear Mr. Karl:

As requested in the above referenced Violation Notice, Michigan Sugar Company (the Company) is providing a response and update on the CEMs situation at the Croswell Factory.

The CEMs downtime first occurred on November 18, 2020. MSC immediately contacted an outside service provider to perform repairs and restore operation. After an initial telephone conference with the outside service provider failed to correct the malfunction, an in-person service call was scheduled. On the day of the scheduled service call, the technician noted that the service provider's COVID-19 policies and restrictions would delay the needed repairs while the technician sought clearance for on-site work. Upon obtaining clearance from the service provider, the responding technician inspected the unit on November 30, 2020 and determined that it was working properly at that time; however, it failed again on December 15, 2020. The same service provider was on-site on December 21, 2020 to perform final repairs. Based upon discussions with the technician it is believed that the malfunction was caused by a faulty internal diaphragm pump in the CEMs unit that was replaced during the last service call. In total, the CEMS downtime was approximately 494 hours, as reported in the CEMs quarterly report. It should be noted that MSC had reason to believe that issues with the CEMs unit had been properly addressed prior to December 21, 2020 since the malfunction of the CEMS unit was intermittent. A RATA was conducted by Network Environmental on December 8, 2020, which indicated that the CEMS unit was properly functioning.

MSC would also like to note that despite the CEMs downtime referenced in the VN, it believes that it was actually in compliance with applicable emissions limitations in its permit, for the reasons set forth below:

- a) Prior to the outage the CEMS data established compliance;
- b) Proper operation of the CEMS documented in the December 8, 2020 RATA report, (between CEMS malfunctions) showed compliance;
- c) A significant margin of compliance between actual emissions and permitted emission was demonstrated during the source compliance testing conducted on December 9, 2020, and,
- d) During the CEMs outage period, Boiler #4 operated within normal operating parameters.

At this time, the CEMs unit is functioning and has been properly calibrated. MSC takes compliance very seriously and has taken or will take the following steps to prevent or minimize the potential for a recurrence of CEMs malfunction that it is referenced in the VN:

- 1) The CEMs unit will receive an upgrade (during the inter-campaign period while the boiler is down) to allow for electronic alerts to MSC staff and management in the event of a CEMs unit outage or system failure.
- 2) The Company is currently evaluating additional measures, including the availability of critical component (spare parts calibration gases, etc.), that will help minimize CEMs downtimes.
- 3) The Company has retained outside technical support services to evaluate the CEMs requirements and SOP for program enhancements and best practice recommendations.

It is the Company's intent to implement the above response and preventive measures, which will prevent or minimize a reoccurrence. While 100% uptime of a sensitive and technically advanced measuring device such as this is very difficult to achieve in practice, the Company and its consultant believe the measures will greatly reduce the potential for or duration of any future malfunctions or outages.

The Croswell factory went off-line for the normal inter-campaign period, commencing March 31, 2021, which means that the boiler will not be in service beginning on April 1, 2021. This Boiler unit (and CEMs equipment) will remain off line until required for the upcoming beet processing campaign following the 2021 growing season.

If you have additional questions regarding this response, please contact Mr. Jeffrey Pfof, EPI at 616-218-8353, Mr. Eric Rupprecht, Michigan Sugar at 989-860-6656 or Mr. Jason Lowry, Michigan Sugar Company at 989-778-0003, ext. 2203.

Michigan Sugar Company



Jason Lowry

cc: Robert Powers, Croswell Factory, Michigan Sugar Company
Ms. Karen Kajiya-Mills, EGLE-AQD Technical Programs
✓ Mr. Chris Hare, EGLE-AQD Saginaw Bay District
Mr. Ben A. Witkopp, EGLE-AQD Saginaw Bay District
Mr. Jeff Pfof, Environmental Partners, Inc