

January 11, 2023

Lindsey Wells
EGLE, Air Quality Division
Constitution Hall, 2nd Floor South
525 West Allegan Street
Lansing, Michigan 48933

Jenine Camilleri
EGLE, Air Quality Division
Constitution Hall, 2nd Floor South
525 West Allegan Street
Lansing, Michigan 48933

Subject: Response to Violation Notice Dated December 22, 2022
MI-ROP-B2876-2019a
Michigan Sugar Company – Crosswell Factory

Dear Ms. Wells and Ms. Camilleri,

Michigan Sugar Company (MSC) respectfully submits this response to the December 22, 2022, Violation Notice. MSC submits that any failure to continuously monitor NOx emissions from 8/22/22 through 9/2/22 was due to a failure of the O2 sensor and subsequently waiting for a replacement part to arrive. Due to the potential oxidation of an O2 sensor while sitting on a shelf, they are ordered when needed. During this period MSC asserts that there were no excess emissions based on boiler operational data.

A corrective action has been implemented where work orders are now in place to ensure and verify that the CEMS unit is operational at the beginning of campaign as well as properly shutdown at the end of campaign. This corrective action will also include an update to our operating procedures and documentation to ensure that alarms are operational, and operators have proper response.

MSC has developed a Quality Assurance Manual for the CEMs unit at the Crosswell factory as required by the Consent Order (AQD 2019-11). MSC also maintains relevant records required by the Consent Order. We are attaching a copy of those records to this response at your request.

Please feel free to contact me with any questions or comments of the forgoing.

Sincerely,



Meaghan Martuch
Air Compliance Manager
Michigan Sugar Company
Office: 989-686-0161, ext. 2236
Cell: 989-780-2550

TITLE: MICHIGAN SUGAR COMPANY – CROSWELL -
 Continuous Emission Monitoring System
 QUALITY ASSURANCE MANUAL

Written By: S. Smock

Effective Date: July 2019

Appendix C Daily Checklist

Cal Gas expiration: 1/31/2030

Year: <u>2022</u>	Operator	AutoCal NOx & O2 successful?		Manual Calibration Passed?		Comments	
date & time		If not alarm should be active.		Only if AutoCal fails.			
8/22/7:30	LVC	P	B	(F)	Yes	(No)**	O2 BAD O2 CELL NOT BAD FOR
8/23/9:00	LVC	P	B	(F)	Yes	(No)**	O2 BAD O2 CELL NOT BAD FOR
8/24/8:00	LVC	P	B	(F)	Yes	(No)**	ISSUE TALK TO BOB'S FOR PARTS
8/25 9:30	LVC	P	B	(F)	Yes	(No)**	601 CO WORKING PARTS FRIDAY
8/26 9:00	LVC	P	B	(F)	Yes	(No)**	STILL WAITING ON PARTS
8/27 9:30	LVC	P	B	(F)	Yes	(No)**	WAITING FOR PARTS
8/28 8:30	LVC	P	B	(F)	Yes	(No)**	WAITING FOR PARTS
8/29 9:00	LVC	P	B	(F)	Yes	(No)**	STILL WAITING
8/30 8:00	LVC	P	B	(F)	Yes	(No)**	
8/31 7:00	LVC	P	B	(F)	Yes	(No)**	PARTS DUE TODAY
9/1 8:00	LVC	P	B	(F)	Yes	(No)**	NO PARTS
9/2 7:30	LVC	P	B	(F)	(Yes)	(No)**	PARTS IN 9-1-22 5:00 PM
9/3 7:30	LVC	(P)	B	F	Yes	No**	
9/4 7:45	J.J.	(P)	B	F	Yes	No**	
9/5 7:30	J.J.	(P)	B	F	Yes	No**	
9/6 7:30	LVC	(P)	B	F	Yes	No**	
9/7 7:15	LVC	(P)	B	F	Yes	No**	
9/8 9:00	LVC	(P)	B	F	Yes	No**	
9/9 7:30	LVC	(P)	B	F	Yes	No**	
9/10 8:30	LVC	(P)	B	F	Yes	No**	
9/11 7:30	LVC	(P)	B	F	Yes	No**	
9/12 7:15	LVC	(P)	B	F	Yes	No**	
9/13 7:20	LVC	(P)	B	F	Yes	No**	
9/14 7:30	LVC	(P)	B	F	Yes	No**	
9/15 8:00	LVC	(P)	B	F	Yes	No**	
9/16 7:30	LVC	(P)	B	F	Yes	No**	
9/17 8:30	LVC	(P)	B	F	Yes	No**	

* P = Pass, B=Bad should start investigating cause of deterioration F = Fail: perform manual calibration, notify maintenance of failure if Manual Calibration does not work on second attempt.

** Go to "Investigations into Calibration Issues" and complete

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 Continuous Emission Monitoring System
 QUALITY ASSURANCE MANUAL

Written By: S. Smock

Effective Date: July 2019

Appendix C Daily Checklist

Cal Gas expiration: 1/21/2030

Year: <u>22</u> date & time	Operator	AutoCal NOx & O2 successful?	Manual Calibration Passed?	Comments
		If not alarm should be active.	Only if AutoCal fails.	
9/18 7:30	LVC	(P) B F	Yes No**	
9/19 8:30	LVC	(P) B F	Yes No**	
9/20 7:45	LVC	(P) B F	Yes No**	MONITOR SOLUTION SERVING 10:00 AM AROUND 9 AM TILL 12:40 PM
9/21 8:00	LVC	P B (F)	(Yes) No**	MONITOR SOLUTION SO MUCH MOISTURE!
9/22 9:00	LVC	(P) B F	Yes No**	
9/23 9:00	AT	(P) B F	Yes No**	
9/24 8:00	AT	(P) B F	Yes No**	
9/25 8:00	LVC	(P) B F	Yes No**	
9/26 8:15	LVC	(P) B F	Yes No**	
9/27 7:30	LVC	(P) B F	Yes No**	
9/28 8:15	LVC	(P) B F	Yes No**	
9/29 7:15	LVC	(P) B F	Yes No**	
9/30 7:15	LVC	(P) B F	Yes No**	
10/1 8:00	LVC	(P) B F	Yes No**	
10/2 8:30	LVC	(P) B F	Yes No**	
10/3 7:00	JWH	(P) B F	Yes No**	
10/4 8:05	JWH	(P) B F	Yes No**	
10/5 7:30	JWH	(P) B F	Yes No**	
10/6 7:20	JWH	(P) B F	Yes No**	
10/7 7:20	JWH	(P) B F	Yes No**	
10/8 7:45	LVC	(P) B F	Yes No**	
10/9 7:30	JWH	(P) B F	Yes No**	
10/10 7:05	JWH	(P) B F	Yes No**	
10/11 7:20	LVC	(P) B F	Yes No**	
10/12 7:30	LVC	(P) B F	Yes No**	
10/13 7:20	LVC	(P) B F	Yes No**	
10/14 7:40	LVC	(P) B F	Yes No**	

* P = Pass, B=Bad should start investigating cause of deterioration F = Fail: perform manual calibration, notify maintenance of failure if Manual Calibration does not work on second attempt.
 ** Go to "Investigations into Calibration Issues" and complete