



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

January 30, 2018

Mr. Kenneth W. Bennett, Factory Manager
Michigan Sugar Company - Croswell Factory
159 South Howard Avenue
Croswell, Michigan 48422

SRN: B2876, Sanilac County

Dear Mr. Bennett:

VIOLATION NOTICE

On September 19, 2017, the Michigan Sugar Company – Croswell Factory had stack testing conducted on its pulp dryer. Testing was required by conditions found in the facility’s Renewable Operating Permit (ROP) MI-ROP-B2876-2013. The test was performed to determine the amount of particulate matter (PM) being emitted. The test results were furnished via email on November 30, 2017.

Review of the test report in comparison to the conditions of ROP number MI-ROP-B2876-2013 results in the following:

Process Description	Rule/Permit Condition Violated	Comments
Pulp Dryer	Condition I (1) PM limit 0.10 pound per 1,000 pounds of exhaust gases.	Results: 0.2040 pound per 1,000 pounds of exhaust gases
Pulp Dryer	Condition V (2) c submit a complete test report of the test results to the District Supervisor or the Technical Programs Unit within 60 days following the last date of the test.	Test results were submitted late.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 20, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

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If Michigan Sugar Company - Croswell 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 violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Ben Witkopp
Environmental Engineer
Air Quality Division
989-894-6219

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Hare, DEQ
Mr. Steve Smock, Michigan Sugar
Mr. David Noble, Michigan Sugar