



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYHER
DIRECTOR

October 17, 2018

Mr. Ken Bennett, Factory Manager
Michigan Sugar Company
159 South Howard Avenue
Crosswell, Michigan 48422

SRN: B2876; Sanilac County

Dear Mr. Bennett:

VIOLATION NOTICE

The Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), has received and reviewed the 3rd Quarter 2018 continuous emission monitoring report submitted by Michigan Sugar Company, located at 159 South Howard Street, Crosswell, Michigan. The AQD Permit to Install #21-15A, requires the facility to monitor and record nitrogen oxides emissions from the #4 Riley natural gas-fired boiler on a continuous basis, in a manner, and with instrumentation acceptable to the AQD. This boiler is also subject to Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart Db.

The 3rd quarter 2018 excess emission reports indicated that there was an extended period of monitor downtime. Specifically, the monitor was down 92.7% during this time. Also, the required quality assurance/quarterly cylinder gas audit was not performed.

During the review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-RileyBLR	PTI No. 21-15A, SC V1.2 & Appendix A	Failure to continuously monitor nitrogen oxides emissions
	40 CFR 52.21(c) & (d), 40 CFR 60.49b(d)	Failure to continuously monitor nitrogen oxides emissions
	40 CFR 60, Appendix F & PTI No. 21-15A, Appendix A	Failure to perform required quarterly Quality Assurance

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Please initiate the actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 7, 2018, (which coincides with 21 calendar days from the date of this letter). The written response should include: the exact dates (start and end) the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; whether the daily calibrations were performed: the results of the daily calibrations; 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 reoccurrence.

If Michigan Sugar Company 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



Karen Kajiya-Mills, Supervisor
Technical Programs Unit
Field Operations Section
Air Quality Division
517-256-0880

cc: Mr. Steve Smock, Michigan Sugar Company
Ms. Mary Ann Dolehanty, MDEQ
Mr. Craig Fitzner, MDEQ
Mr. Christopher Ethridge, MDEQ
Mr. Chris Hare, MDEQ
Ms. Jenine Camilleri, MDEQ
Mr. Ben Witkopp, MDEQ