



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

October 14, 2016

Mr. John Lang, VP Operations  
AmCane Sugar, LLC  
21010 Trolley Industrial Drive  
Taylor, MI 48180

SRN: M4732, Wayne County

Dear Mr. Lang:

**VIOLATION NOTICE**

On February 1, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of AmCane Sugar, LLC located at 21010 Trolley Industrial Drive, Taylor, Michigan. The purpose of this inspection was to determine emissions compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Wayne County Installation Permits C-11547 and C-11548 (hereafter also the WC Permits).

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Boilers No. 1 & 2	WC Permits C-11547 and C-11548, Special Condition (SC) 23	Facility failed to install and operate the boiler stacks according to the permit specifications.
	WC Permits C-11547 and C-11548, SC 24	Facility failed to monitor and record the amounts of fuel combusted in each boiler in a manner with instrumentation acceptable to the Division.

Special Condition 23 of the WC Permits requires "The exhaust gases from the boilers shall be discharged unobstructed vertically upwards to the ambient air from stacks with maximum diameter of 24 inches for boiler No. 1, and 26 inches for boiler No. 2 at an exit point not less than 48 feet above ground level." AmCane Sugar LLC provided stack designs that specified a maximum diameter of 28 inches and an exit point of 35 feet above ground level for both Boiler No. 1 and Boiler No. 2. In addition, both boiler stacks are affixed with rain caps and therefore the exhaust gases from neither stack exhausts unobstructed vertically upwards.

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Special Condition 24 of the WC Permits requires that the "Applicant shall monitor and record in the amounts and types of fuel combusted in each boiler in a manner and with instrumentation acceptable to the Division. All such records including the 12-month rolling time period of PM-10, SO<sub>2</sub>, CO, and NO<sub>x</sub> emission calculations shall be kept on file for the most recent two year period and be made available to the Division upon request." AmCane Sugar LLC indicated the natural gas fuel meter malfunctioned for nine months in 2014 rendering the company unable to document the amounts of natural gas usage in the boilers. Further, when the fuel meter is operational, records are not maintained in a fashion that enables the facility to demonstrate that each boiler, individually, does not fire natural gas in excess of 7500 hours per year, as limited within SC 21 of the WC Permits.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 4, 2016 (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 reoccurrence.

If AmCane Sugar LLC 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 and for the cooperation that was extended to me during my inspection of AmCane Sugar LLC. 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,



Terseer Hemben  
Environmental Engineer  
Air Quality Division  
313-456-4677

cc via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ