



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

June 18, 2019

Dr. John Lang
AmCane Sugar, LLC
21010 Trolley Industrial Drive
Taylor, MI 48180

SRN: M4732, Wayne County

Dear Dr. Lang:

VIOLATION NOTICE

On May 7, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), performed an audit of the 2018 Michigan Air Emissions Reporting System (MAERS) report submitted by AmCane Sugar, LLC located at 21010 Trolley Industrial Drive, Taylor, Michigan. The purpose of this audit was to determine AmCane Sugar, LLC's 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 Permit numbers C-11547 and C-11548.

During the audit, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Boiler No. 1 and/or Boiler No. 2	Wayne County Installation Permit Numbers C-11547 and C-11548; Special Condition 19	Reported carbon monoxide (CO) emissions of 9.63 tons in calendar year 2018 for Boiler 1 and Boiler 2, combined. Boiler 1 and Boiler 2 each has an individual emission limit of 4.13 tons per year.

The Wayne County Installation Permits C-11547 and C-11548, Special Condition 19 requires that "pollutant emission rates from each boiler...shall not exceed the limits that are listed in the table 1"; and the CO limit for each boiler is listed 4.13 tons per year.

The AmCane Sugar, LLC reported the calculated combined CO emissions for the two boilers (Boiler 1 and Boiler 2) to be 19257.93 pounds, which equates to 9.63 tons. This numerical amount exceeds the sum of the two individual limits for the two boilers (8.26 tons) for the calendar year 2018. Therefore, AQD determines the AmCane Sugar, LLC to be in violation of Special Condition 19 of the Wayne County Installation Permits C-11547 and C-11548.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 9, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Detroit District, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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 information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation 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: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Wilhemina McLemore, EGLE
Mr. Jeff Korniski, EGLE