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April 26, 2023

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

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

Regarding: Response to Violation Notice, March 8, 2023
Michigan Sugar Company – Caro Factory
SRN: B2875

Dear Ms. Wells and Ms. Camilleri:

Environmental Partners, Inc. (EPI) is responding on behalf of Michigan Sugar Company (“MSC”) to the March 8, 2023 violation notice (VN) regarding CEMs units on Boiler #4 at their Caro Factory. As we have previously indicated, MSC is evaluating its CEMs program in response to the VN, and has retained a CEMs expert from Mostardi Platt (MP) to assist the Company and EPI with the noted issues regarding the continuous emission monitoring system (CEMs unit) serving EUBOILER4 at the Caro Factory.

On April 11, 2023 a team including MSC, EPI and MP visited the facility for the purpose of determining the CEMs unit status and to prepare a plan for addressing the alleged violations. The investigative team noted that quarterly audits of the instruments has been historically conducted, and focused on the operation and quality assurance components of the instrument. From that site visit, MP has recommended preventive maintenance be performed on the CEMs unit. MSC will have MP perform the second quarter 2023 CGA’s during the preventive maintenance service in a combined event.

MP is scheduled to return to the site between June 1 and June 16, 2023 to perform the regularly scheduled CEMs unit CGA and they will take that opportunity to perform any necessary preventive maintenance on the CEMs unit. Mostardi Platt will correlate the CGA event with the unit data to ensure proper calibration of the CEMs equipment and provide onsite training to the CEMs operators to ensure proper procedures are followed going forward.

MSC and its representatives will provide the Michigan EGLE, Air Quality Division (EGLE-AQD) with the results of the 2nd Quarter CGA results upon completions. If either of you have questions regarding this response or the planned event, please contact either Meaghan Martuch at 989-686-0161 or me at 616-218-8353.

Sincerely,

ENVIRONMENTAL PARTNERS, INC.



Jeffrey M. Pfost

Principal Consultant to Michigan Sugar

cc: Josh Taylor, Michigan Sugar Company
Nick Klein, Michigan Sugar Company
Michele Robbins-Troutman, Michigan Sugar Company
Meaghan Martuch, Michigan Sugar Company
Nathanial Gentle, EGLE-AQD, Bay City
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