



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

November 5, 2018

Mr. William Gough
Michigan Sugar Company - Caro Factory
819 Peninsular Street
Caro, Michigan 48723

SRN: B2875, Tuscola County

Dear Mr. Gough:

VIOLATION NOTICE

On October 3, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Michigan Sugar Company - Caro Factory located at 819 Peninsular Street, Caro, Michigan. The purpose of this inspection was to determine Michigan Sugar Company - Caro Factory'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 Renewable Operating Permit (ROP) number MI-ROP-B2875-2013a;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-PACKAGEBOILER3	Special Condition VI.1	Visible emissions surveys are not being conducted.

The conditions of ROP number MI-ROP-B2875-2013a require daily visible emissions surveys during daylight hours, for opacity from the EU-PACKAGEBOILER3 stack (SVPACKAGEBOILER3). The date and time of the visible emissions survey, together with the initials of the person performing the survey, shall be recorded on a log. If visible emissions in excess of approximately 15% opacity are observed for six minutes, the permittee shall perform and record at least one 15-minute visible emissions reading in accordance with Federal Reference Test Method 9, by a certified reader.

During this inspection, Michigan Sugar Company – Caro Factory was unable to produce the visible emissions survey records. This is a violation of the recordkeeping specified in Special Condition VI.1 for EU-PACKAGEBOILER3.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 26, 2018 (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;

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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 the DEQ, AQD, Saginaw Bay District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Michigan Sugar Company – Caro 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 violation cited above and for the cooperation that was extended to me during my inspection of Michigan Sugar Company - Caro Factory. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number or email address listed below.

Sincerely,



Meg Sheehan
Environmental Quality Analyst
Air Quality Division
989-439-5001
sheehanm@michigan.gov

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Chris Hare, DEQ
Mr. Steven Smock, MSC