

November 30, 2022

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

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

Subject: Response to Second Violation Notice Dated November 19, 2022
MI-ROP-B2876-2019a
Michigan Sugar Company – Croswell Factory

Dear Ms. Wells,

Michigan Sugar Company (MSC) respectfully submits this response to the November 16, 2022 Second Violation Notice (SVN) issued by the Michigan Department of Environment, Great Lakes and Energy (EGLE). In the SVN, EGLE states that the previous written response to VN20220919, (received by EGLE on October 10, 2022) failed to demonstrate that adequate CEMS operation and quality assurance/quality control are being implemented, including operating, recordkeeping, and oversight for the CEMS unit in Croswell.

EGLE has requested we review the regulations and situation regarding the Riley Boiler operation on April 1, 2022:

The Croswell Riley Boiler was operated for 10 hours on April 1, and then shuttered for the inter-campaign period lasting until August, 2022. The seasonal facility operation processes sugar beets up to the period they run out of beets or the beet quality diminishes to the point that extractable sugar is no longer viable.

Point #1; The status of the boiler was in Shutdown Mode since the facility was not operating. 40 CFR 60, Appendix A at paragraph 5.1.4 states in part:

*Also, cylinder gas audits are not [to] be required for calendar quarters in which the **affected facility** does not operate. We assert the **sugar beet processing facility** was not operational and the Riley boiler was not operating normally, but rather in shutdown mode.*

Point #2: A cylinder gas audit or CGA for the Riley Boiler CEMs was conducted 3/2/2022. 40 CFR 60 Appendix F paragraph 5.1 states:

Each CEMS must be audited at least once each calendar quarter. Successive quarterly audits shall occur **no closer than 2 months**. April 1, 2022 is closer than 2 months to the previous CGA, indicating an audit was not possible before the boiler was shuttered for the inter-campaign period.

Michigan Sugar Company
Croswell Factory SRN B2876
Response to SVN 20221116

Notwithstanding the above regulatory references, and in the spirit of cooperating with EGLE's request for additional information, we offer the following:

- Croswell Continuous Emissions Monitoring System Quality Assurance and Quality Control Plan
- Croswell Quality Assurance manual

Respectfully submitted



Meaghan Martuch
Air Compliance Manager
Michigan Sugar Company
Office: 989-686-0161, ext. 2236
Cell: 989-780-2550