



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

March 12, 2021

UPS NEXT DAY DELIVERY

Robert Powers
Michigan Sugar Company – Croswell Factory
159 South Howard Street
Croswell, Michigan 48422

SRN: B2876; Sanilac County

Dear Mr. Powers:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) reviewed the Continuous Emission Monitoring System (CEMS) 4th Quarter 2020 Excess Emissions Report (EER) submitted by Michigan Sugar Company – Croswell Factory located in Sanilac, Michigan. The Renewable Operating Permit number MI-ROP-B2876-2019 requires the facility to monitor and record Nitrogen Oxides (NO_x) from EU-RILEYBLR (Boiler #4) on a continuous basis in a manner and with instrumentation acceptable to the AQD.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-RILEYBLR	MI-ROP-B2876-2019 EU-RILEYBLR, VI, 2	Failure to continuously monitor NO _x .

The 4th Quarter 2020 EER indicated an excessive period (22.42%) of NO_x monitor downtime for EU-RILEYBLR (Boiler #4).

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 2, 2021 (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.

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If Michigan Sugar Company – Croswell Factory believes the above observations or statements are inaccurate or do not constitute a violation 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. 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 or by email at KarlM@Michigan.gov.

Sincerely,



Matt Karl
Environmental Quality Analyst
Air Quality Division
517-282-2126

cc: Mr. Steven Smock, Michigan Sugar Company
Ms. Karen Kajiya-Mills, EGLE
Mr. Chris Hare, EGLE
Mr. Ben Witkopp, EGLE