



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 10, 2015

Mr. Scott Schroeder, EHS Engineer
Perrigo Company
515 Eastern Avenue
Allegan, Michigan 49010

SRN: B7276, Allegan County

Dear Mr. Schroeder:

VIOLATION NOTICE

On September 1, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Perrigo Company (Facility), located at 515 Eastern Avenue, Allegan, Michigan. The purpose of this inspection was to determine the Facility'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 administrative rules; and the conditions of your Permits to Install (PTI). The PTI No. 416-93F covers the Plant 4 building, and PTI No. 208-89C covers the Plant 5 building.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
32 Million Btu per hour natural gas fired boiler	40 CFR 60 Subpart Dc, §60.48c	Failure to notify of boiler installation.

The 32 Million Btu/hr boiler in Plant 4 was installed in 2013 and is subject to the federal Standards of Performance for New Sources (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units. These standards are found in Title 40 of the Code of Federal Regulations, Part 60, Subpart Dc.

The §60.40c states: (a) The affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h). The §60.40c states:

- a. The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include: (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

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During the inspection, staff of the AQD also observed the operation of all the cartridge filters controlling various operations in both Plant 4 and Plant 5. During this review, it was determined that the Operation and Maintenance (O&M) Plan needs to be updated for both Plant 4 and Plant 5. Specifically, the Dust Collector Identification Table for Plant 5 needs to be corrected for removed and added collectors. The Plant 4 O&M Plan needs to have a Dust Collector Identification Table added since it currently is not part of the O&M Plan. For both plants, please add a column indicating whether the exhaust is internal or external to a stack.

In Plant 4, it was observed that the differential pressure gauge on DC 411, controlling the tablet coater A4R33, needs to be replaced. The current gauge does not have the range to measure the listed operational differential pressure range of the collector.

During the inspection, staff inspected the stacks from the roof to determine compliance with the permitted stack parameters. Many of the stacks were not labelled so that they could be easily matched up with the emission unit and dust collector. Staff recommends that labels be placed on each stack to identify the SV identification.

Please initiate actions necessary to correct the cited NSPS violation and submit a written response to this Violation Notice by October 1, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violation occurred and a summary of the actions that have been taken and are proposed to be taken to correct the violation.

Also, please submit updated O&M Plans and respond with a plan regarding the gauge and stack issues by September 29, 2015.

Lastly, there are two active permits for the Facility covering equipment that appears to have been removed. Please review PTI No. 214-92 and PTI No. 345-80, and request to have them voided if appropriate.

If the Facility 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 and other issues cited above and for the cooperation that was extended to me during my inspection of the Facility.

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If you have any questions regarding the violation or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,

A handwritten signature in black ink that reads "Dale Turton". The signature is written in a cursive style with a large, prominent "D" and "T".

Dale Turton
Senior Environmental Engineer
Air Quality Division
269-567-3554

DT:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ