

March 16, 2018

Amanda Chapel
Environmental Quality Analyst
Air Quality Division
7953 Adobe Road
Kalamazoo, Michigan 49009-5025



Dear Ms. Chapel:

Subject: SRN A6630, Van Buren County
MDEQ Air Quality Division, Violation Notice, dated February 26, 2018
Written Response and Corrective Actions

The Coca-Cola North America, CCNA, (Facility), SRN A6630, has received the above referenced findings of the inspection conducted by the MDEQ AQD on February 13, 2018. As we understand the findings there are two main issues listed in the report: 1) a Cleaver Brooks boiler installed in 2016 without a Permit To Install (PTI), and 2) testing / recordkeeping requirements for existing PTI 353-08, FGDIGEST (boiler P03 and flare PO2).

Following is each issue outlined in the AQD letter (noted in bold), with the Facility response (noted in italics).

1) Facility installed a new 36.7 MMBtu/hr Cleaver Brooks boiler capable of burning both natural gas and biogas without obtaining a permit.

As CCNA understands the issue, when the referenced boiler was modified to accept biogas, in addition to natural gas, an evaluation was not accomplished to determine if a PTI was required or if the equipment qualified as an exempt source. Further it is our understanding the boiler would not require a PTI if the only source of fuel was natural gas (R336.1282(2)(b)(i)). But, since the boiler is capable of operating with biogas it requires a PTI, unless deemed exempt in accordance with R336.1282(2)(g) sour gas-burning equipment, if the actual emission of sulfur dioxide does not exceed 1 pound per hour.

CCNA is in the process of gathering information concerning the hydrogen sulfide concentration in order to more accurately estimate the sulfur dioxide emission rate from the boiler. Once this information is obtained CCNA will proceed with the application process to obtain a PTI. In the short-term CCNA will not feed biogas to this boiler until such time an application is submitted, and approved by the MDE, or a determination, reviewed by the MDEQ – AQD permit section, deems a PTI is not required.

We anticipate that the Hydrogen Sulfide emission evaluation and permit application will be completed by **April 13, 2018**.

2) At the time of the inspection, the facility was not taking weekly biogas stream samples to determine hydrogen sulfide concentrations.

The facility has initiated taking weekly biogas samples and is currently sending the samples to an outside laboratory to determine hydrogen sulfide concentration. The facility will continue sending the samples to an outside laboratory until the facility obtains the necessary equipment to determine hydrogen sulfide concentrations and can perform the analysis in house.

3) The Facility was keeping records of daily meter readings, but not documenting if biogas was sent to EUP03 or flare.

The facility has initiated documenting when the biogas is being sent to the flare or the EUP 03 Boiler.

4) The Facility was unable to provide records of the determination of Hydrogen Sulfide concentration of the biogas from EUDIGESTER

The facility has initiated taking weekly biogas samples and once the sample data is available, recording of the required information will commence.

5) Calculations were not available at the time of inspection, since samples were not being taken.

Upon obtaining Hydrogen Sulfide concentration data the facility will commence recording the required information.

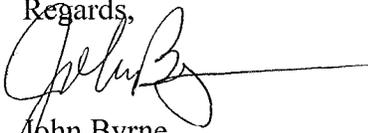
6) Daily calculations for the hydrogen sulfide emissions from the flare were not completed at the time of inspection.

Upon obtaining information concerning Hydrogen Sulfide concentrations the facility will commence recording the required information. Additionally, we will request that the daily calculations be changed to weekly calculations to match our weekly sampling requirement.

Coca-Cola Paw Paw would like to thank you for your visit and guidance as we complete the action items listed above.

Please contact Rhonda Quint, SES Manager, at 269-657-8437 if you have any questions or need additional information.

Regards,

A handwritten signature in black ink, appearing to read 'John Byrne', with a long horizontal line extending to the right.

John Byrne
Plant Manager
Coca-Cola, Paw Paw