



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

February 26, 2018

Ms. Rhonda Quint
Coca-Cola North America
38279 Red Arrow Highway
Paw Paw, Michigan 49079

SRN: A6630, VanBuren County

Dear Ms. Quint:

VIOLATION NOTICE

On February 13, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Coca-Cola North America (Facility), located at 38279 Red Arrow Highway, Paw Paw, 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) No. 353-08.

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

Process Description	Rule/Permit Condition Violated	Comments
New Cleaver Brooks boiler installed 2016	Rule 201	Facility installed a new 36.7 MMBtu/hr Cleaver Brooks boiler capable of burning both natural gas and biogas without obtaining a permit.
FGDIGEST	PTI No. 353-08, V.1	At the time of the inspection, the facility was not taking weekly biogas stream samples to determine hydrogen sulfide concentrations.
FGDIGEST	PTI No. 353-08, VI.2	The Facility was keeping records of daily meter readings, but not documenting if biogas was sent to EUP03 or flare.

FGDIGEST	PTI No. 353-08, VI.3	The Facility was unable to provide records of the determinations of the hydrogen sulfide concentration of the biogas from EUDIGESTER.
FGDIGEST	PTI No. 353-08, VI.4	Calculations were unavailable at the time of inspection, since samples were not being taken.
FGDIGEST	PTI No. 353-08, VI.5	Daily calculations for the hydrogen sulfide emissions from the flare were not completed at the time of inspection.

During this inspection, the Facility was unable to produce emission records. This is a violation of the recordkeeping and emission limitations specified in Special Condition Number V.1, VI.2, VI.3, VI.4, and VI.5 of PTI No. 353-08.

The conditions of PTI No. 353-08 require records of the daily meter readings of the amount of biogas from EUDIGESTER sent to EUP03 and the flare, and records of the determinations of the hydrogen sulfide concentration of the biogas from EUDIGESTER. Additionally, PTI No. 353-08 requires calculations of the hydrogen sulfide emissions from the flare on a daily basis, and completed calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month for the previous calendar month.

During this inspection, it was noted that the Facility had installed and commenced operation of unpermitted equipment at this Facility. The AQD staff advised the Facility on February 13, 2018, that this is a violation of Rule 201 of Act 451.

A program for compliance may include a completed PTI application for the Cleaver Brooks 36.7 MMBtu/hr boiler installed in 2016. An application form is available by request or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment, which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 19, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

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violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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 violations cited above and for the cooperation that was extended to me during my inspection of the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Amanda Chapel
Environmental Quality Analyst
Air Quality Division
269-910-2109

AC:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Jen Klang, DEQ
Ms. Mary Douglas, DEQ

