



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JACKSON DISTRICT OFFICE



DAN WYANT  
DIRECTOR

September 15, 2014

**CERTIFIED MAIL 7010 0290 0000 3734 2071**  
**RETURN RECEIPT REQUESTED**

Mr. Stephen Petz, EHS Manager  
Airgas Dry Ice \ Carbonic  
2530 Sever Road, Suite 300  
Lawrenceville, Georgia 30043

SRN: N8207 , Lenawee County

Dear Mr. Petz:

**VIOLATION NOTICE**

On June 13, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Airgas Carbonic, Inc (Airgas) located at 7031 Silberhorn Hwy, Blissfield, Michigan. The purpose of this inspection was to determine Airgas' 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 Permit to Install (PTI) number 31-13.

During the inspection, staff was unable to determine Airgas' compliance with the following:

Process Description	Rule/Permit Condition Violated	Comments
EUAIRSTRIP	Condition I. 1.	Acetaldehyde emission limit based on a verified emission factor
EUAIRSTRIP	Condition V. 1.	Failed to conduct AQD requested performance testing to determine the representative emission factor for acetaldehyde and compliance with the existing emission limitation.

The PTI No. 31-13 Condition I.1. limits the EUAIRSTRIP emissions of Acetaldehyde to 0.745 tons per year based on a 12 month rolling time period as determined at the end of each month. During the inspection AQD informally requested Airgas verify the emission factor used in their emission calculations and provided as an estimate of Acetaldehyde emissions in the permit application. Airgas subsequently conducted internal preliminary sampling/testing and informed AQD that the results indicate the emission factor may be higher than previously determined.

On August 8, 2014, AQD sent Airgas a formal request to conduct performance testing of EUAIRSTRIP in accordance with PTI 31-13, Special Condition V.1.. To date, the AQD has not received a formal proposed test plan with test date(s) from Airgas.

This letter acknowledges that Airgas has been cooperative and has had ongoing communication with AQD since the initial inspection. Recently, Airgas submitted a letter dated September 10, indicating they are evaluating a treatment system for the acetaldehyde in their wastewater which is discharged to the local municipality. Airgas has scheduled a meeting on September 16, to discuss this option with them.

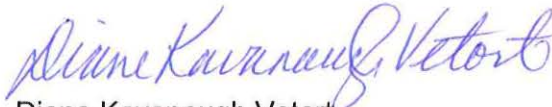
A significant amount of time has passed since AQD's initial inspection and the formal request to conduct performance testing was sent to Airgas. At this time AQD has insufficient information to determine Airgas' compliance with the existing permit emission limit for Acetaldehyde from EUAIRSTRIP.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 6, 2014. The written response should include: the dates the 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 Airgas 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 Airgas. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Diane Kavanaugh Vetort  
Senior Environmental Quality Analyst  
Air Quality Division  
517-780-7864

cc: Mr. Daniel Swartz, Riga Carbonic Plant Manager, Airgas  
Mr. Scott Miller, DEQ

cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ