

Monica ✓

zoetis

FOR ANIMALS. FOR HEALTH. FOR YOU.

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December 29, 2017

Ms. Monica Brothers
Michigan Department of Environmental Quality
Air Quality Division
Kalamazoo District Office
7953 Adobe Rd
Kalamazoo, MI 49009-5025



SUBJECT: Permit No 30-05C: Sections III.1, IV.1, VI.1 &5 & Rule 910 NOV

Dear Ms. Brothers:

This letter is follow-up to the notice of violation received December 18, 2017. While performing a self-audit on 11/30/2017 of Zoetis's Historian system, which is used to monitor the exhaust gas temperature of the condenser, the Historian system was found offline and not recording the temperature since 10/24/2016 @ 9:23 PM. The temperature of the condenser was 17.95°C at that point in time. However, the condenser has been working for this entire time for production purposes. The Historian system is back online as of 09/28/2017 at 1:00 AM. The Automation Engineer cannot provide any explanation as to why the Historian system went offline on its own or why it did not set off an alarm. As of the date of this letter, the historian system is functional and operating properly.

The proposed corrective actions are to install an alarm to notify colleagues that the Historian system has gone offline; and to audit the system more frequently to ensure it is operational. The InBatch/Historian system is being upgraded on January 2nd and the InSql alarm will be added to the InBatch system by January 31, 2018 to give operation notification that it is not operating properly. A formal project request will be submitted to the automation team to analyze a better mechanism of capturing the continuous monitoring of the condenser temperature as a secondary backup of the historian system to satisfy the continuous monitoring portion of the permit.

Please contact me at (269) 220.8351 or (269)348.2348 with any questions or concerns regarding this self-audit finding.

Sincerely,

A handwritten signature in black ink that reads "Latonia Raines".

Latonia Raines
Manager EH&S: Environmental
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