



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



DAN WYANT
DIRECTOR

June 11, 2014

Mr. Christopher Gill
Director of Greenhouse Operations
Maroa Farms
270 North Filmore Road
Coldwater, Michigan 49036

SRN: P0517, Branch County

Dear Mr. Gill:

VIOLATION NOTICE

On May 28, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Maroa Farms (Facility), located at 270 North Filmore Road, Coldwater, 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); and the administrative rules.

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

Process Description	Rule/Permit Condition Violated	Comments
Two hot water boilers	40 CFR 60, Subpart A and Dc	Failure to notify of installation.
Emergency generator	Rule 201	Installation without a permit.

Hot Water Boilers:

The two hot water boilers are subject to the federal Standards of Performance for New Stationary Sources for Small Industrial-Commercial-Institutional Steam Generating Units. These standards are found in Title 40 of the Code of Federal Regulations (CFR), Part 60, Subparts A and Dc.

Both §60.7 and §60.48c require that the owner or operator of each affected facility shall submit notification of the date of construction and actual startup, and the size of the unit.

A Permit to Install (PTI) was not needed. Rule 282(b)(i) exempts sweet natural gas burning equipment with a rated heat input capacity of not more than 50,000,000 Btu per hour. These units are rated at approximately 37,000,000 Btu per hour.

Mr. Christopher Gill
Page 2
June 11, 2014

Emergency Generator:

The emergency generator is subject to the federal Standards of Performance for New Stationary Sources for Stationary Compression Ignition Internal Combustion Engines. These standards are found in Title 40 of the CFR, Part 60, Subpart IIII. According to §60.4214, no notification is required for compression ignition reciprocating internal combustion engines less than 2,237 Kw.

During this inspection, it was noted that the Facility had installed an emergency generator. The diesel fired generator is rated at a maximum 780 Kw (1046 BHP) with a maximum fuel flow of 127 gph.

An PTI was needed. Rule 285(g) exempts from permitting internal combustion engines that have less than 10,000,000 Btu per hour maximum heat input. According to the maximum fuel flow listed on Kohler's spec sheet for this unit, it appears that this does not qualify for the exemption. Therefore this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the generator. An application form is available by request or at the following website:
http://www.deq.state.mi.us/aps/nsr_information.shtml#AUP

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 3, 2014. The written response should include: the dates the violations occurred; 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.

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,



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

DT:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ