UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

CERTIFIED MAIL 7007 0710 0003 6239 8472
RETURN RECEIPT REQUESTED

July 28, 2010

In Reply Refer To: CWA-309(a)-10-017

Darin Croston, Plant Manager
Phoenix Coca-Cola Bottling Company
1850 West Elliot Road
Tempe, Arizona 85284

Dear Mr. Croston:

This administrative order, issued under the authority of the Clean Water Act, establishes a schedule of corrective actions to achieve consistent compliance with sewer discharge limits. EPA made the initial findings in an inspection report issued on May 28, 2010.

The enclosed administrative order issued today requires Phoenix Coca-Cola Bottling in Tempe, Arizona to achieve consistent compliance with its sewer discharge limits for pH, and to self-monitor and report the monitoring results for one year. These requirements are necessary because the sample record documented violations of the national prohibitions and local limits for pH. The key dates are as follows:

KEY DATES	ADMINISTRATIVE ORDER CWA-309(a)-10-017
08/30/10	1. Submit response to the May 28, 2010 EPA inspection report.
09/01/10	5-10. Begin one year of self-monitoring under this Order. Continuous measurements of pH, and discharge flow rate. Weekly samples for BOD and TDS.
09/30/10	2. Submit preliminary engineering plans for compliance with pH limits.
12/30/10	3. Submit progress report.
03/30/11	4. Achieve compliance with pH limits – Submit a notice of completion.
08/31/11	End self-monitoring under this Order.
* * *	Self-monitoring reports are due on the 28th day of each month for the samples collected during the previous calendar month.

The enclosed Finding of Violation and Administrative Order is issued pursuant to Sections 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Clean Water Act ("the Act") as amended 33 U.S.C. Sections 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A). Section 309(a), (b), (d), and (g) of the Act, 33 U.S.C. Section 1319(a), (b), (d), and (g), provides administrative and/or civil judicial relief for failure to comply with the Act. In addition, Section 309(c) of the Act, 33 U.S.C. Section 1319(c), provides criminal sanctions for negligent or knowing violations of the Act, and for knowingly making false statements.

The request for information in the Administrative Order is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act because it is not a "collection of information" within the meaning of 44 U.S.C. Sections 3502(3) and 5 CFR § 1320.5(c) because it is directed to fewer than ten persons. Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is an administrative action against a specific entity [44 U.S.C. § 3518(c)(1)(B) and 5 CFR § 1320.4(a)(2)].

EPA has promulgated regulations to protect the confidentiality of the business information it receives at 40 CFR Part 2, Subpart B. A claim of business confidentiality may be asserted in the manner specified by 40 CFR Section 2.203(b) for all or part of the information requested. EPA will disclose business information covered by such a claim only as authorized under 40 CFR Part 2, Subpart B. If no claim accompanies the business information at the time EPA receives it, EPA may make it available to the public without further notice. Phoenix Coca-Cola Bottling may not withhold from EPA any information on the grounds that it is confidential business information.

If you have any questions regarding this matter, please contact Greg V. Arthur of my staff at (415) 972-3504 or at arthur.greg@epa.gov.

Sincerely,

Original signed by:

Alexis Strauss
Director, Water Division

Enclosure

cc: Mike Golden, Envr Compliance Supervisor, City of Tempe
Gregory Frech, WQ Compliance, ADEQ
Ann Macdonald, Envr Affairs Manager, Coca-Cola Bottling

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 9

In the Matter of	)	
	)	
Phoenix Coca-Cola Bottling Company	)	FINDING OF VIOLATION
Tempe, Arizona	)	
	)	AND ORDER
Proceedings under Section 308(a) and 309(a)(3),	)	
(a)(4) and (a)(5)(A) of the Clean Water Act, as	)	Docket No. CWA-309(a)-10-017
amended, 33 U.S.C. Section 1318(a) and	)	
1319(a)(3), (a)(4) and (a)(5)(A)	)	

STATUTORY AUTHORITY

The following Finding of Violation and Order is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (EPA) pursuant to Sections 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Clean Water Act [33 U.S.C. Sections 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)] (hereinafter the Act). This authority has been delegated by the Administrator and the Regional Administrator of EPA Region 9 to the Director of the Water Division of EPA Region 9.

FINDING OF VIOLATION

The Director of the Water Division of EPA Region 9 finds that Phoenix Coca-Cola Bottling in Tempe, Arizona is in violation of Section 307(d) of the Act [33 U.S.C. Section 1317(d)]. This Finding is made on the basis of the following facts:

1. Section 307(d) of the Act [33 U.S.C. Section 1317(d)] prohibits any owner or operator of any source from introducing pollutants into publicly owned treatment works (POTWs) in violation of any effluent standard or prohibition or pretreatment standard promulgated under Section 307 of the Act.
2. Under Section 307(b) of the Act [33 U.S.C. § 1317(b)], EPA promulgated the following general pretreatment regulations:

a. The national pretreatment standards in 40 CFR 403.5(b)(2) for all industrial dischargers into POTWs nationwide, which prohibit the introduction of pollutants that will cause corrosive structural damage to the POTW, and in no case have a pH below 5.0 s.u.;

b. The national pretreatment standards in 40 CFR 403.5(d) for all industrial dischargers into the City of Tempe domestic sewer system and the City of Tempe Kyrene Water Reclamation Plant and the City of Phoenix 91st Avenue Wastewater Treatment Plant, which defines local limits developed in accordance with the 40 CFR 403.5(c) to be Pretreatment Standards for the purposes of Section 307(d) of the Act [33 U.S.C. § 1317(d)];

c. The definition in 40 CFR 403.3 of the term, Pretreatment Standards, which is defined to mean any regulation containing pollutant discharge limits promulgated by EPA in accordance with Section 307 (b) and (c) of the Act, [33 U.S.C. § 1317(b) and (c)], including the specific prohibitions and local limits established pursuant to 40 CFR 403.5(b) and (d).

3. Phoenix Coca-Cola Bottling is a corporation and therefore a person within the meaning of Section 502(5) of the Act, [33 U.S.C. § 1362(5)]. Phoenix Coca-Cola Bottling is a non-domestic wastewater source in Tempe, Arizona. Phoenix Coca-Cola Bottling introduces pollutants within the meaning of Section 502(6) of the Act [33 U.S.C. § 1362(6)], into a portion of the City of Tempe domestic sewer system that feeds into the City of Tempe Kyrene Water Reclamation Plant, and the City of Phoenix 91st Avenue Wastewater Treatment Plant, which together are POTWs within the meaning of Section 307(b) and the pretreatment regulations in 40 CFR 304.3(o). Phoenix Coca-Cola Bottling is

therefore subject to the provision of the Act, [33 U.S.C. § 1251 et seq., including Section 307, 33 U.S.C. § 1317].

4. On September 24, 2009, an EPA inspector and a representative of the City of Tempe conducted a compliance evaluation inspection of Phoenix Coca-Cola Bottling:

a. Facility Description: Phoenix Coca-Cola Bottling Company owns and operates a beverage bottling plant at 1850 West Elliot Road, Tempe, Arizona:

i. The bottling plant operations involve seven bottling lines (two carbonated in plastic, two carbonated in aluminum, two non-carbonated/water in plastic, and one fountain bag-in-a-box), water preconditioning, syrup blending, ammonia compressor cooling, clean-in-place maintenance, sanitation, and product reject crushing. The bottling plant does not make any containers or any of the ingredients;

ii. The seven bottling lines and the supporting operations generate water preconditioning ultra-filtration backwash and reverse osmosis reject waters, product spills, clean-in-place spents and rinses, plant and equipment sanitation wash down, drainage from the ammonia compressor room, and drainage from the reject crushing operations.

b. Wastewater Discharges to the Sewer: Phoenix Coca-Cola Bottling discharges process-related wastewaters into the domestic sewers which feed into the City of Tempe Kyrene Water Reclamation Plant for discharge into the Salt River or to reclaim, and which also can feed into the City of Phoenix 91st Avenue Wastewater Treatment Plant for discharge to the Salt River or to reclaim:

i. Process-related wastewaters from Phoenix Coca-Cola Bottling drain through a single sewer connection into the Tempe domestic sewers;

ii. The City of Tempe permit No.012008-01 authorizes the discharge of non-domestic wastewater from Phoenix Coca-Cola Bottling to the sewers;

iii. All backwashes, rejects, washdown, spents, rinses, and bleeds are delivered by gravity through in-plant floor drains to treatment;

iv. Treatment consists of a grease trap, followed by two underground pH neutralization reaction vault tanks, plumbed in series, followed by a shut-off valve, for discharge to the sewers through a sample vault identified by permit outfall number as compliance sample point IWD-5033.01;

v. The discharge of process-related wastewater to the sewers is continuously monitored for pH at the compliance sampling point IWD-5033.01.

c. Pretreatment Standards: The following national prohibitions, and local limits apply to the discharges from Phoenix Coca-Cola Bottling to the Tempe sewers:

Regulated Parameters * @ IWD-5033.01	National Prohibitions (instant-maximum)	Local Limits (instant-maximum)
pH minimum (instant-max) pH maximum (instant-max)	5.0 s.u. -	5.0 s.u. 10.5 s.u.

* The City of Tempe permit and ordinance set limits for other pollutants including toxic metals, cyanide, toxic organics, and discharge flow rate.

d. Inspection Report: The report for the September 24, 2009 inspection was issued on May 28, 2010.

5. Phoenix Coca-Cola Bottling violated Section 307(d) of the Act [33 U.S.C. § 1317(d)] in that:

a. Phoenix Coca-Cola Bottling submitted self-monitoring, as required by the City of Tempe's permit, which included summaries of the continuous pH monitoring of the discharge through IWD-5033.01 to the Tempe sewers.

b. EPA reviewed the January 2008 through March 2010 Tempe sample record for Phoenix Coca-Cola Bottling and determined that Phoenix Coca-Cola Bottling violated the national prohibitions and local limits on at least 112 occasions, resulting in 112 days of violation under the Clean Water Act:

   i. Violations of the lower pH local limit and the national prohibition of 5.0 s.u. account for 86 days of violation;

   ii. Violations of the upper pH local limit of 10.5 s.u. account for 26 days of violation.

Summary tables of the violations are included in Appendix A of this Order.

6. The inspection report issued on May 28, 2010 of the September 24, 2009 EPA inspection of Phoenix Coca-Cola Bottling is by reference made part of this Finding of Violation and Administrative Order.

ADMINISTRATIVE ORDER

Taking these Findings into consideration and considering the potential environmental and human health effects of the violations and all good faith efforts to comply, EPA has determined that compliance in accordance with the following requirements is reasonable. Pursuant to Section 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Act [33 U.S.C. Section 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)], IT IS HEREBY ORDERED that Phoenix Coca-Cola Bottling comply with the following requirements:

pH Control

1. By **AUGUST 30, 2010**, Phoenix Coca-Cola Bottling shall submit short responses to the findings in Sections 2.0, 3.0, 3.2, 3.3, 3.4, 3.5, and 4.0 of the May 28, 2010 EPA inspection report.
2. By **SEPTEMBER 30, 2010**, Phoenix Coca-Cola Bottling shall submit a preliminary engineering plan of the steps to be taken in order to consistently comply with the national prohibition and local limits for pH. This preliminary engineering plan shall include:
    a. A detailed description of the pH control system in-place. This description shall include the following:
        i. A written explanation of the design and operation of the pH control system, including the stages of pH control, the reagents in use, the conceptual theory behind the pH control, and the clean-out practices to remove foam and solids from the pH control tanks;
        ii. A written description of the pH control instrumentation, including the type and number of pH electrodes, the type of pH controllers, and the methods of tuning, calibrating, and conducting routine maintenance;

iii. A schematic of the pH control system, including all wastewater piping, wastewater tankage, equalization, sumps, reagent tanks, pH controllers, mixers, control valves, reagent feed lines, and measurement points.

b. A determination of the cause(s) of the violations of the national prohibition against discharges with pHs below 5.0 s.u. at any time, and the local limits prohibiting discharges with pHs above 10.5 s.u. at any time;

c. A description of the corrective actions to be taken in order to consistently comply with the national prohibition and local limits for pH. This description shall include the following:

i. A written explanation of each corrective action to be taken;

ii. A written explanation of the resulting design, operation, and instrumentation of the proposed pH control system, including the stages of pH control, the reagents in use, the conceptual theory behind the pH control, the clean-out practices to remove foam and solids from the pH control tanks, the type and number of pH electrodes, the type of pH controllers, and the methods of tuning, calibrating, and conducting routine maintenance;

iii. A schematic of the proposed pH control system, annotated to show all corrective actions to be taken;

d. A schedule of corrective actions that does not extend past March 30, 2011.

3. By **DECEMBER 30, 2010**, Phoenix Coca-Cola Bottling shall submit a progress report regarding the corrective actions to consistently comply with pH limitations, as required by item 2(c) of this Order.

4. By **MARCH 30, 2011**, Phoenix Coca-Cola Bottling shall complete the corrective actions to consistently comply with pH limitations, as required by item 2(c) of this Order, and submit a notice of completion.

Self-Monitoring Requirements

5. From **SEPTEMBER 1, 2010 THROUGH AUGUST 31, 2011**, Phoenix Coca-Cola Bottling shall self-monitor the wastewater discharges to the sewers at the compliance point designated in this Order as IWD-5033.01 in accordance with the following sampling schedule:

   a. **CONTINUOUSLY,** Phoenix Coca-Cola Bottling shall self-monitor for pH and discharge flow rate;

   b. **ONCE EACH WEEK**, Phoenix Coca-Cola Bottling shall self-monitor for biochemical oxygen demand ("BOD"), and total dissolved solids ("TDS");

   c. **ONCE EVERY MONTH**, Phoenix Coca-Cola Bottling shall summarize the continuous pH meter strip charts and the continuous discharge flow rate metering to reflect the following:

      i. The number of minutes each day in which the pH is below 2.0;

      ii. The number of minutes each day in which the pH is below 5.0;

      iii. The number of minutes each day in which the pH is above 10.5;

      iv. The number of minutes each day in which the pH is above 12.5;

      v. The total number of minutes each day of self-monitoring for pH;

      vi. For each day, the lowest and highest pH measurements;

      vii. The discharge flow rate for each day.

6. The sewer sampling of the discharges required in item 5 of this Order shall be representative of the overall discharge to the Tempe sewers at the compliance sampling point IWD-5033.01, unless EPA approves a new sample point or points.

7. Phoenix Coca-Cola Bottling shall self-monitor and analyze using the sampling protocols and EPA approved analytical methods to achieve the detection limits indicated below:

Parameters	Sampling Protocols	Req'd Detection Limits
flow rate	continuous flow meter or meter reading	-
pH	continuous meter	0.1 s.u.
BOD	24-hour flow-weighted composite	5 mg/l
TDS	24-hour flow-weighted composite	5 mg/l

Submissions

8. By the **TWENTY-EIGHTH (28th) DAY OF EACH MONTH**, Phoenix Coca-Cola Bottling shall submit all self-monitoring results for the previous month. The first monthly report is due on September 28, 2010 for the August 2010 self-monitoring. The 12th-and-last monthly report is due on August 28, 2011 for the July 2011 self-monitoring.

9. For each sample, Phoenix Coca-Cola Bottling shall record the following:

   a. The sample results;

   b. Type of sample (ie. 24-hour composite, grab, or continuous);

   c. The name of the laboratory used;

   d. The EPA analytical methods used;

   e. The date, time, location of sampling, and sampling point (ie: IWD-5033.01);

10. All reports submitted pursuant to this Order shall be signed by a principal executive officer of Phoenix Coca-Cola Bottling and shall include the following statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified

personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that all wastewater samples analyzed and reported herein are representative of the ordinary process wastewater flow from this facility. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

11. All submissions shall be mailed to the following addresses:

U.S. ENVIRONMENTAL PROTECTION AGENCY
75 Hawthorne Street
San Francisco, California 94105
Attn: Greg V. Arthur (WTR-7)

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
1110 West Washington Street
Phoenix, Arizona 85007
Attn: Gregory Frech

CITY OF TEMPE
P.O. Box 5002
Tempe, Arizona 85280
Attn: Michael Golden

12. This Administrative Order is not and shall not be interpreted to be a National Pollutant Discharge Elimination System permit under Section 402 of the Act, [33 U.S.C. § 1342], nor a local industrial user permit under 40 CFR Part 403.8(f)(iii). In addition, this letter shall not in any way extinguish, waive, satisfy, or otherwise affect Phoenix Coca-Cola's obligation to comply with the Act or its regulations, as well as any other Federal, State or local law, including the sewer use ordinance for the City of Tempe.

13. This Order takes effect upon signature.

Original signed by:

Alexis Strauss
Director, Water Division

July 28, 2010
Dated

Appendix A (page 1 of 3)
Violation Summary for Phoenix Coca-Cola Bottling

Local Limits Violations (01/01/08-03/31/10)

sample dates	type	sampler	point	permit local limits ①		viols	days
02/14/10	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.6	1
01/09/10 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.83	1
01/04/10 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	2.41	1
12/12/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	2.02	1
12/06/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	1.81	1
12/03/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	2.25	1
10/03/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.52	1
09/26/09	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	11.36	1
09/25/09	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	11.47	1
09/24/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	2.28	1
09/23/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.7	1
09/18/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.93	1
09/14/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.73	1
09/12/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.93	1
09/07/09	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.54	1
08/23/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.76	1
08/22/09	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.63	1
08/21/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.67	1
08/14/09	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.62	1
08/09/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.98	1
08/01/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.01	1
07/25/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.25	1
07/18/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.8	1
07/10/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.72	1
07/09/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.75	1
07/08/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.8	1
07/07/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.82	1
06/27/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.83	1
06/26/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.16	1
06/24/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.61	1
06/22/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.94	1
06/18/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.96	1
06/17/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.18	1
06/16/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.47	1
06/10/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.42	1
06/05/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.63	1
06/02/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.82	1
05/29/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.37	1
05/27/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.98	1
05/22/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.97	1

① The pH measurements below 5.0 s.u. also violate specific national prohibitions in 40 CFR 403.5(b)(2).

Appendix A (page 2 of 3)
Violation Summary for Phoenix Coca-Cola Bottling

Local Limit Violations (01/01/08-03/31/10)

sample dates	type	sampler	point	permit local limits ①		viols	days
05/21/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.85	1
05/12/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.8	1
05/11/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.83	1
04/18/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	1.72	1
04/11/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.95	1
04/05/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.98	1
04/03/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.43	1
03/27/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.54	1
03/22/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.38	1
03/03/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.02	1
02/20/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.1	1
02/12/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.08	1
02/05/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.87	1
02/03/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.07	1
01/29/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.0	1
01/22/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.93	1
01/15/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.86	1
01/10/09	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.52	1
01/07/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.9	1
01/02/09 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.65	1
12/26/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.96	1
12/20/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.83	1
12/12/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.62	1
12/09/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.98	1
12/05/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.94	1
11/25/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.43	1
11/24/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.43	1
11/23/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.43	1
11/20/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.89	1
11/16/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.76	1
11/14/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.03	1
11/03/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.12	1
11/02/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.81	1
10/30/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.87	1
10/21/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.82	1
10/10/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.77	1
10/09/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	3.78	1
10/05/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.89	1
10/04/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	11.1	1
09/27/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.94	1

① The pH measurements below 5.0 s.u. also violate specific national prohibitions in 40 CFR 403.5(b)(2).

Appendix A (page 3 of 3)
Violation Summary for Phoenix Coca-Cola Bottling

Local Limit Violations (01/01/08-03/31/10)

sample dates	type	sampler	point	permit local limits ①		viols	days
09/26/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.92	1
09/19/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.64	1
09/18/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.79	1
09/12/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.97	1
09/11/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.79	1
09/06/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.32	1
08/29/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	11.63	1
08/28/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	11.65	1
08/22/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.64	1
08/17/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	11.21	1
08/09/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.53	1
08/07/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	2.58	1
08/02/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	11.43	1
07/20/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.76	1
07/16/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.52	1
07/14/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.66	1
07/09/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.91	1
07/05/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	11.74	1
07/04/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	11.24	1
05/27/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.92	1
05/24/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	11.43	1
05/18/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.8	1
05/17/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.67	1
05/14/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.8	1
05/10/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.7	1
04/24/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.85	1
04/21/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.58	1
03/31/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.44	1
03/30/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	12.22	1
03/23/08	continuous	IU	5033.01	pH – daily-maximum	10.5 s.u.	10.74	1
03/13/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	4.98	1
03/12/08 ①	continuous	IU	5033.01	pH – daily-minimum	5.0 s.u.	2.12	1
					Total Days of Violation		**112**

① The pH measurements below 5.0 s.u. also violate specific national prohibitions in 40 CFR 403.5(b)(2).