



March 20, 2024

Gina McCann
Environmental Quality Specialist
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
401 Ketchum Street, Suite B
Bay City, MI 48708-5430

Subject: Hemlock Semiconductor Operations LLC response to EGLE Air Compliance Violation Notice

Dear Ms. McCann:

This letter is provided in response to the air violation notice emailed to Hemlock Semiconductor Operations LLC (HSC) on March 11, 2024.

During your visit to HSC on February 7, 2024, where you performed a routine audit of the site's compliance with our Renewable Operating Permit (ROP) B2644-2021a, it was discovered that the S11ETCH unit violated Special Condition III.1. maintain the pH of caustic scrubber at a minimum of 7. The S11 etch bench remained in operation for approximated 1.5 hours during a period of low pH (<7) on April 12, 2023.

As required, this written documentation from HSC is to provide the following information: dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. Please find our response to each item as follows:

- the dates the violation occurred;
 - April 12, 2023
- an explanation of the causes and duration of the violation;
 - The suction tubing going into the scrubber's caustic supply tote had slipped from where it was attached in the chemical shed. Gravity pulled the tubing out of the tote. The caustic is used to help maintain neutral pH. The period during which the process was in operation and out of range was approximately 1.5 hours.

- whether the violation is ongoing;
 - No, the matter was corrected as soon as it was discovered.
- a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place;
 - Operations reseated the tubing into the tote and to its anchor point in the chemical shed. pH soon fell back into range. End of event.
- what steps are being taken to prevent a recurrence.
 - Spotfire, HSC's internal data tracking software, was programmed to include email alerts.
 - Engineering personnel will review Standard Operating Procedures and Work Instructions with unit operations, which include inspections of equipment integrity and ROP compliance parameters.
 - Engineering personnel are evaluating the ability to program preemptive alerts and/or interlocks into the DCS software (live data recording system).

If you have any questions about this submission, please contact Alyssa Beebe at 989-301-5280.

Sincerely,



Alyssa Beebe
Environmental Professional
Hemlock Semiconductor Operations LLC

cc: Leanne Bishop, EHS&S Manager, HSC
Jenine Camilleri, Enforcement Unit Supervisor, EGLE AQD