



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



AARON B. KEATLEY
ACTING DIRECTOR

July 7, 2023

Michael Markowski
Arkema, Inc.
1415 Steele Avenue SW
Grand Rapids, Michigan 49507

SRN: E4569, Kent County

Dear Michael Markowski:

VIOLATION NOTICE

On June 7, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Arkema, Inc. located at 1415 Steele Avenue SW, Grand Rapids, Michigan. The purpose of this inspection was to determine Arkema, Inc.'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); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 100-07D.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Resin production process	PTI No. 100-07D, FGRESINPROD, Special Condition No. IV.2	Failure to maintain temperature of regenerative thermal oxidizer above 1,500°F.
Resin production process	PTI No. 100-07D, FGRESINPROD, Special Condition No. VI.4.h	Failure to properly maintain records of the loading rack condenser.

During this inspection, a review of the temperature records for the regenerative thermal oxidizer found that for approximately 1.5 months, the temperature routinely went below 1,500° F. This is a violation of the operating parameters established by PTI No. 100-07D.

Following a request of the temperature records for the maximum exit temperature records of the loading rack condenser, AQD learned that the records were not in a readily available format, and there were gaps in information available. This is a violation of the recordkeeping requirements established by PTI No. 100-07D.

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A review of the Malfunction Abatement Plan (MAP) for the control devices listed in PTI No. 100-07D found that the information does not meet the requirements found in Michigan Air Pollution Control Rule 336.1911.

As such, in accordance with Rule 911, the AQD is requesting the submittal of an updated MAP for the control devices listed in PTI No. 100-07D.

Rule 911(1) states:

Upon request of the department, a person responsible for the operation of a source of an air contaminant shall prepare a malfunction abatement plan to prevent, detect, and correct malfunctions or equipment failures resulting in emissions exceeding any applicable emission limitation.

Please submit a MAP, including a complete Preventative Maintenance Program, by August 21, 2023. The full Rule 911 can be found here:

<https://www.michigan.gov/egle/about/organization/air-quality/laws-and-rules>

In accordance with Rule 1001 (R 336.2001) and General Condition 13 of PTI No. 100-07D, the AQD is requesting that Arkema, Inc. conduct air emissions performance testing on the regenerative thermal oxidizer that controls emissions from FGRESINPROD located at your facility.

Please submit a test protocol within 60 days of receipt of this letter. The protocol shall include a proposed date for the testing, which is to be conducted no later than October 5, 2023. The test should determine the VOC emission rate and the destruction efficiency of the regenerative thermal oxidizer. All testing must be conducted using United States Environmental Protection Agency approved test methods.

Not less than 7 days before the performance test is conducted, the AQD must be notified in writing of the time and place of the performance tests and who shall conduct them. Results of the performance test shall be submitted to the department in the format prescribed by the applicable reference test method within 60 days after the last date of the test.

Copies of the test plan should be sent to the Department of Environment, Great Lakes, and Energy, Air Quality Division Technical Programs Unit at P.O. Box 30260, Lansing, Michigan 48909-7760 and the Grand Rapids District Office at the address identified below.

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Finally, please submit documentation related to applicability of the Chemical Manufacturing Area Sources National Emissions Standards for Hazardous Air Pollutants (NESHAP) found in 40 CFR Part 63 Subpart VVVVV. Information and forms for this notification can be found at the following website:
<https://www.epa.gov/stationary-sources-air-pollution/example-notification-reports-national-emission-standards-hazardous>.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 28, 2023 (which coincides with 21 calendar days from the date of this letter). 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.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Arkema, Inc. 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 Arkema, Inc. 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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE