

H.C. Starck Inc.  
460 Jay Street  
Coldwater, MI 49036 USA  
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September 23, 2021

EGLE  
Mr. Chance Collins  
Environmental Quality Analyst  
Air Quality Division, Kalamazoo District  
7953 Adobe Road  
Kalamazoo, MI 49009



Mr. Collins,

H. C. Starck is in receipt of your Letter of Violation Notice SRN:B1523 dated September 7, 2021. It is our position that we were tracking and documenting the cited below with accordance to our permit. There are two units for verification: SAP reports for production and Cority HSE Software.

**Permit to Install (PTI) number 12-17A, Rule/Permit Condition Violated: SC VI.3 (EU-SPHERICAL)**

Cause of the Violation: Facility is not keeping 12-month rolling time period records of pounds of spray dried material produced in EU-SPHERICAL.

Remedial Action Taken: At the time of inspection, the time the manager was not able to run the report out of SAP. A database was developed assist exporting the 12-month rolling time period report from SAP.

Steps Taken To Prevent A Reoccurrence: Database saved on Coldwater TEAMS drive for access.

Duration of the Violation: None

**Permit to Install (PTI) number 12-17A, Rule/Permit Condition Violated: SC VI.2 (EU-EXFUR3)**

Cause of the Violation: Facility is not keeping 12-month rolling time period records of the hours of operation of EU-EXFUR3 in rich burn mode and exhaust temperature.

Remedial Action Taken: EU-EFUR3 has not been in "Rich Burn" and is not put in that state. There has been a log sheet posted in extrusion to note when and for how long the unit was put into "Rich Burn".

Steps Taken To Prevent A Reoccurrence: Quarterly audit to verify the log is complete.

Duration of the Violation: None

**Permit to Install (PTI) number 12-17A, Rule/Permit Condition Violated: SC VI.1 and SC VI.2 (FG-COMBUSTION & FG-EXTRUSION)**

Cause of the Violation: Facility is not keeping 12-month rolling time period records of: The amount (in pounds) of material processed, the amount in pounds of material removed from dust collector DC-3, PM and VOC emission calculations.

Remedial Action Taken: At the time of inspection, the time the manager was not able to run the report out of SAP. A database was developed assist exporting the 12-month rolling time period report from SAP and to convert the unit to pounds from our conventional kilograms.

Steps Taken To Prevent A Reoccurrence: Database saved on Coldwater TEAMS drive for access.

Duration of the Violation: None

**Permit to Install (PTI) number 12-17A, Rule/Permit Condition Violated: SC VI.1 (FG-FACILITY)**

Cause of the Violation: Facility is not keeping 12-month rolling time period records of PM emissions.

Remedial Action Taken: At the time of inspection, the time the manager was not able to run the report out of SAP. A database was developed assist exporting the 12-month rolling time period report from SAP.

Steps Taken To Prevent A Reoccurrence: Database saved on Coldwater TEAMS drive for access.

Duration of the Violation: None

Respectfully,



Ryan Dominak  
Sr. HSEQ Manager, Product Safety  
H.C. Starck Inc.

CC:  
Ms. Jenine Camilleri  
Enforcement Unit Supervisor at EGLE, AQD  
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