



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 7, 2021

Mr. Brian Olson
H.C. Starck Inc.
460 Jay Street
Coldwater, Michigan 49036

SRN: B1523, Branch County

Dear Mr. Olson:

VIOLATION NOTICE

On July 19, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of H.C. Starck, Inc. located at 460 Jay Street, Coldwater, Michigan. The purpose of this inspection was to determine H.C. Starck, Inc. 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 12-17A;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-SPHERICAL	SC VI.3	Facility is not keeping 12-month rolling time period records of pounds of spray dried material produced in EU-SPHERICAL.
EU-EXFUR3	SC VI.2	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.
FG-EXTRUSION	SC VI.1	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.
FG-COMBUSTION	SC VI.2	Facility is not keeping 12-month rolling time period records of NOx and CO emission rates from FG-COMBUSTION.
FG-FACILITY	SC VI.1	Facility is not keeping 12-month rolling time period records of PM emissions.

During this inspection, H.C. Starck, Inc. was unable to produce emission records.

This is a violation of EU-SPHERICAL SC VI.3, EU-EXFUR3 SC VI.2, FG-EXTRUSION SC VI.1, FG-COMBUSTION SC VI.2, and FG-FACILITY SC VI.1 specified in Special Conditions of PTI number 12-17A.

The conditions of PTI number 12-17A require maintenance of records, which shall be made available for review upon request by the AQD staff.

Enclosed is a copy of the above cited (rule/regulation).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 28, 2021 (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, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If H.C. Starck, 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of H.C. Starck, 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,

A handwritten signature in black ink, appearing to read 'Chance Collins', with a stylized flourish at the end.

Chance Collins
Environmental Quality Analyst
Air Quality Division
269-254-7119

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE