



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 21, 2021

Mr. Adam Bates
Vertellus Zeeland, LLC
215 North Centennial Street
Zeeland, Michigan 49464

SRN: B2817, Ottawa County

Dear Mr. Bates:

VIOLATION NOTICE

On August 31, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received notification that an abnormal event resulting in an air release occurred at Vertellus Zeeland, LLC located at 215 North Centennial Street, Zeeland, Michigan. The release resulted in white plastic fallout attributed to Vertellus Zeeland, LLC's operations.

Upon investigation of the incident, staff determined the following:

Process Description	Rule/Permit Condition Violated	Comments
Reactor Vessel Release	Rule 901(b)	Fall out consisting of a white plastic type material .
Reactor Vessel Release	Permit to Install (PTI) No. 107-09G, FGCONSOLIDATED, Special Condition (SC) I.2	Exceedance of the VOC emission limit of 0.03 pounds per pound of product, except ethylene.
Reactor Vessel Release	PTI No. 107-09G, FGCONSOLIDATED, SC I.10.g	Exceedance of the Category 7 TAC pounds per hour emission limit for SV0177 operations based on an annual averaging time.
Reactor Vessel Release	PTI No. 107-09G, FGCONSOLIDATED, SC I.12.d	Exceedance of the Category 4 TAC pph emission limit for SV0177 operations based on an 8-hour averaging time.

The records provided demonstrate that actual emissions from FGCONSOLIDATED for the event were 5454 pounds of Volatile Organic Compounds (VOCs), 5439 pounds per hour of xylene, and 15 pounds per hour of maleic anhydride. PTI No. 107-09G, FGCONSOLIDATED, SC I.2, I.10.g, and I.12.d limit VOC emissions to 0.03 pounds per pound. of product, 28 pounds per hour for category 7 TAC pollutants with an annual average time (xylene), and 0.0032 pounds per hour for category 4 TAC pollutants with an 8-hour averaging time (maleic anhydride), respectively.

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In the professional judgment of AQD staff, the fallout observed was of sufficient intensity as to constitute a violation of Rule 901(b) of the administrative rules promulgated under Act 451 and General Condition 6 of PTI number 107-09G. EGLE staff observed the fallout in residential areas near the company.

Since actions have been implemented as outlined in the letter from Vertellus Zeeland, LLC dated September 10, 2021, no additional response is required.

If Vertellus Zeeland, LLC 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. 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,



Kaitlyn DeVries
Senior Environmental Quality Analyst
Air Quality Division
616-558-0552

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE
Mr. Dave Wierzbicki, EGLE