



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

July 10, 2024

Kevin Biehl
Siliconature
4255 68th Street SE
Caledonia, Michigan 49316

SRN: P0742, Kent County

Dear Kevin Biehl:

VIOLATION NOTICE

On May 30, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Siliconature located at 4255 68th Street SE, Caledonia, Michigan. The purpose of this inspection was to determine Siliconature'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 158-16B.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Plastic film coating line	PTI No. 158-16B, EU-CoatingLine-01, Special Condition III.1	Failure to capture all waste coatings and store them in closed containers.

During the inspection, AQD staff observed 55-gallon drums of waste material with the bungs open and waste coating material spilling out of the bung holes. This is a violation of the permit related to capturing and storing waste materials in closed containers. Additionally, Siliconature subtracts the volume of waste and the associated volatile organic compound (VOC) emissions associated with that waste from the total emissions from the facility. In 2023, Siliconature subtracted 77,000 pounds of VOC emissions from the total, indicating those emissions were disposed of properly. Since there were waste materials spilling out, the AQD no longer accepts this method of determining emissions from the facility and requests that a new method of calculating emissions be developed and submitted for review. The approach should include a waste material sampling plan and assessment of VOCs disposed of in the waste.

Following a review of the annual inspections of the regenerative thermal oxidizer (RTO) and discussions with Siliconature, AQD learned that the ceramic heat exchange media in the unit had become fouled with silicone particulates. While it appears that Siliconature replaced the ceramic media timely, they also indicated that monitoring of the RTO pressure drop was used to aid in this determination. A review of the facility Malfunction Abatement Plan (MAP) found that this parameter is not currently included in the monitoring provisions. As such, the AQD requests that Siliconature update and resubmit the MAP within 45 days of the date of this letter.

Finally, during the inspection, a new externally vented cleaning process using sulfuric acid was identified. Certain processes and process equipment may be exempt from obtaining a PTI. Rule 278 establishes requirements of eligibility for exemptions listed in Rules 280 through 291. To be eligible for a listed exemption, the owner or operator of an exempt process or exempt process equipment must be able to provide information demonstrating the applicability of the exemption. Pursuant to Rule 278(a), this demonstration should be provided within 30 days of a written request by the AQD and should include the following information:

- The specific exemption being used by the process or process equipment.
- An analysis demonstrating that Rule 278 does not apply to the process or process equipment.

Please submit the waste material sampling plan and assessment of VOCs and the Rule 278 demonstration within 30 days of the date of this letter.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 31, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the 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 submit the written response to April Lazzaro at EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 or LazzaroA1@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Siliconature 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.

Kevin Biehl
Siliconature
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Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Siliconature. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in cursive script, appearing to read "April Lazzaro".

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