



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 13, 2022

Fred McNett
Trinseo, LLC
1604 Building, Barth Street
Midland, Michigan 48667

SRN: P1025, Midland County

Dear Fred McNett:

VIOLATION NOTICE

On December 2, 2022, Trinseo, LLC staff notified the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), that acrylonitrile emissions were estimated to be above the limit allowed in the conditions of Renewable Operating Permit (ROP) number MI-ROP-P1025-2021. On December 12, 2022, Trinseo, LLC provided additional information in a written report submitted in compliance with Air Pollution Control Rules and General Condition 25 (R 336.1912) of the ROP.

The Rule 912, 10 day written report, included information related to violations of Trinseo, LLC's ROP associated with observations during recent stack testing. The facility was also unable to complete the ROP required emission verification testing by the date required in their ROP.

Process Description	Rule/Permit Condition Violated	Comments
EU31 Process heaters F-3A East and F-3B West	ROP No. MI-ROP-1025-2021, EU31, SC I.4	0.06 TPY acrylonitrile emission limit
EU31 Process heaters F-3A East and F-3B West	ROP No. MI-ROP-1025-2021, EU31, SC V.2	Verify emission rates within 360 days of ROP issuance

The information provided indicates that actual emissions of acrylonitrile from the EU31 process heaters are 1.2 lbs/hr and approximately 0.11 tons per year. The conditions of Trinseo, LLC's ROP limit the emissions of acrylonitrile to 0.06 tons per year.

The December 12, 2022, Rule 912 written report included the dates the emission violations occurred, date the elevated emissions stopped, investigative findings as to the causes of the elevated emissions, and corrective actions taken eliminated the elevated emission.

Trinseo, LLC verified in their Rule 912 written report, and submitted a notification to AQD, that emission verification testing is scheduled for EU31 process heaters during the week of January 9, 2023.

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Please initiate any additional actions necessary to correct the cited violations and submit in a written response to this Violation Notice by January 3, 2023 (which coincides with 21 calendar days from the date of this letter).

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Trinseo, 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 violation cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,

A handwritten signature in black ink that reads "Kathy Brewer". The signature is written in a cursive style with a large, stylized "K" and "B".

Kathy Brewer
Senior Environmental Quality Analyst
Air Quality Division
989-439-2100
brewerk@michigan.gov

cc: Alyssa Beebe, Trinseo, LLC
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Chris Hare, EGLE
Jeremiah Brown, EGLE
Lindsey Wells, EGLE