

August 30, 2016

SEP 02 2016

Mr. Nathan Hude
Air Quality Division
Michigan Department of Environmental Quality
Constitution Hall
525 W. Allegan St. 1 South
Lansing, MI 48909-7760

Re: Response to Violation Notice

Dear Mr. Hude,

Alleged Violation #1 – Differential pressure monitoring device inoperative

Huntsman Response - During your onsite compliance inspection on July 22, 2016, a pressure reading of 0.0 inches of water was observed on the differential pressure gauge while the wet scrubber (Rotoclone) was in operation. As no recording of the differential pressure gauge readings are required by Permit 358-99 a precise date when the gauge was inoperable cannot be verified. Huntsman believes the Rotoclone was performing as designed when in service. A sight window in the scrubber water recirculation line is used to visually monitor water circulation and water level in the Rotoclone. Both, appropriate water level and circulation are indicative of proper operation. The Rotoclone was also included in a monthly preventative maintenance schedule to ensure proper operation.

Installation of a new Rotoclone was approved in late 2015, and purchased during the first quarter of 2016. Subsequently, Huntsman replaced the existing Rotoclone and associated ancillary equipment with the new Rotoclone and differential pressure gauge in August 2016. The new Rotoclone is operating and in service. The differential pressure gauge on the new Rotoclone has been verified as operating properly and pressure readings are being conducted and recorded at a minimum of once per shift.

Alleged Violation #2 – Emissions of polymeric diphenyl methane diisocyanate (Rubinate M) unaccounted for

Huntsman Response - As identified during your onsite inspection, Huntsman utilizes Rubinate M as a raw material during our board manufacturing process. As such Rubinate M is not introduced into the Kettles and Mixers. Huntsman does not believe Special Condition #4 applies to the board manufacturing process. Rather Rubinate M is received via tank truck and stored in a 10,000 gallon indoor storage tank. During board manufacturing, Rubinate M is pumped from the 10,000 gallon storage tank to various sized day tanks depending on which carousel is being used. From the appropriate day tank, the Rubinate M is mixed in-line with a polyol and immediately injected into a closed mold where the curing process occurs and is completed within approximately five to 10 minutes.

HUNTSMAN

Rubinate M is used during the board manufacturing process which is limited to the Board Room only. As described in the November 3, 1994, Permit to Install 480-91, the manufacturing activities in the Board Room meet exemption R336.1286(e). As requested, the past two years of Rubinate M usage is 1,490,636 pounds for calendar year 2015, and 591,696 pounds for calendar year 2016, through August. Emissions that occur during the board production will be identified and represented in future MAERS reports.

Alleged Violation #3 – HAPs and VOCs from cold cleaners vented to scrubber are unaccounted for

Huntsman Response - Huntsman utilizes three cold cleaners within the production areas and warehouse to assist with cleaning tools and equipment. Each cold cleaner meets Permit to Install exemption R336.1281(h) due to the air/vapor interface being less than 10 square feet. The VOC/HAP emissions from each cleaner will be identified and represented in future MAERS reports. Additionally, in efforts to reduce emissions, Huntsman is in the process of seeking a non-VOC solvent to be used in the cold cleaners.

MDEQ Additional Request - Please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the facility along with calculations.

Huntsman Response - Due to the complexity of the information requested, Huntsman is respectfully requesting an additional two weeks to ensure that accurate and detailed information is provided to the Michigan Department of Environmental Quality.

If you have any questions or need additional information, please contact Ken Huddleston at (281) 719-7937, or me personally at (517) 324-1427.

Sincerely,



Cathy Parks-Smith
Site Manager