



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

August 9, 2016

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Ms. Cathy Parks-Smith  
Huntsman Advanced Materials  
4917 Dawn Ave.  
East Lansing, Michigan 48823

SRN: A1571, Ingham County

Dear Ms. Parks-Smith:

**VIOLATION NOTICE**

On July 22, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Huntsman Advanced Materials located at 4917 Dawn Ave., East Lansing. The purpose of this inspection was to determine the facility'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) numbers 358-99, 871-90, 580-88A, 785-81, and 689-80.

During the inspection, staff observed the following:

Process Description	Violation Number	Rule/Permit Condition Violated	Comments
EU KETTLES & MIXERS	1	PTI 358-99, Special Condition 9	Differential pressure monitoring device inoperative.
EU KETTLES & MIXERS	2	PTI 358-99, Special Condition 4, Policy and Procedure AQD-013	Emissions of polymeric diphenyl methane diisocyanate (Rubinate M) unaccounted for.
Cold Cleaners	3	Policy and Procedure AQD-013	HAP's and VOC's from coldcleaners vented to scrubber are unaccounted for.

1. During this inspection, it was found that the rotoclone differential pressure monitoring device was not operating with a reading of 0.0. This device is required to ensure proper air flow through the pollution control equipment. The conditions of PTI number 358-99 require the device to be installed and operational; past inspection reports identify 15 inches of water column as the norm.

2. During the inspection, it was stated that polymeric diphenyl methane diisocyanate was no longer used. While researching a MSDS provided by the company, it was found that "Rubinate M" consists of 60-100 percent polymeric diphenyl methane diisocyanate. Emissions of this compound are not being recorded or reported. The conditions of PTI number 358-99 limit the emissions of polymeric diphenyl methane diisocyanate to 0.02 pounds per hour. Based on the lack of records, AQD is unable to determine compliance with this limit.

3. During the inspection, it was found that the cold cleaners in the facility are all vented to the scrubber. The HAP's and VOC's within the solvent used are not calculated or accounted for when determining compliance with the facilities Opt-Out limit. The conditions of PTI number 358-99 limit the emissions of VOC's to 38.3 pounds per hour and 52.6 tons per year.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 30, 2016. 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.

AQD is also requesting the past 2 years usage for Rubinate M to include emission rates in pounds per hour and tons per year.

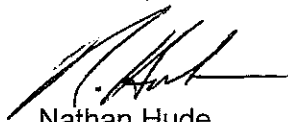
In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. This shall include potential emissions of polymeric diphenyl methane diisocyanate. All calculations for determining emissions shall be explained and cited as appropriate in the demonstration. Information on calculating PTE can be found at the following website:

<http://www.michigan.gov/deg/0,4561,7-135-3310---,00.html>

If Huntsman Advanced Materials 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 during my inspection of Huntsman Advanced Materials. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Nathan Hude  
Environmental Quality Analyst  
Air Quality Division  
517-284-6779

NNH:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Brad Myott, DEQ