

GOVERNOR

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY SAGINAW BAY DISTRICT OFFICE



DAN WYANT DIRECTOR

April 28, 2014

Mr. David Rengering, Site Manager Hemlock Semiconductor Corportation 12334 Geddes Road P.O. Box 80 Hemlock, MI 48626

SRN: B2644, Saginaw County

Dear Mr. Rengering:

VIOLATION NOTICE

On March 27, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) received notification from Hemlock Semiconductor Corporation (HSC) of an emission limit exceedance contained in MI-ROP-B2644-2011 issued to HSC located at 12334 Geddes Road, Hemlock, Michigan. On April 23, 2014, the AQD received a written report detailing the emission exceedances and investigation. The April 23, 2014 report included the following information:

Process Description	Rule/Permit Condition Violated	Comments
EUPLANTVENT3 &EUPLANTVENT4	FGRULE290 I.1, 1,000 lbs uncontrolled, 500 lbs controlled HCL /month	February 24, 2014 HCL emissions due to scrubber non operations
EUPLANTVENT3 &EUPLANTVENT4	General Condition 10	Scrubbers shutdown in response to low flows

The records provided demonstrate that emissions of hydrogen chloride from the EUPLANTVENT3 scrubber were 1,175 pounds total and from EUPLANTVENT4 scrubber were 1,637 pounds total. The conditions of MI-ROP-B2644-2011 limit the emissions of controlled non-carcinogenic material to 500 pounds per month.

HSC determined that the February 24, 2014 HCL emissions resulted from the absence of a low flow alarm for the EUPPLANTVENT3 scrubber and a low priority setting for the EUPLANTVENT4 low flow alarm.

This constitutes a violation of MI-ROP-B2644-2011 General Condition 10 which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 20, 2014. The written response should include: the dates the violations occurred; an explanation of the causes and duration of 401 KETCHUM STREET • SUITE B • BAY CITY, MICHIGAN 48708

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.

If HSC 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. 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,

Kathy L. Brewer Environmental Quality Analyst Air Quality Division (989) 894-6214 Email: brewerk@michigan.gov

KLB/ai

Enclosure(s) cc/via email

cc/via email Mr. Gary Putt, Environmental Manager, HSC Mr. Chris Hare, DEQ Ms. Lynn Fiedler, DEQ Ms. Teresa Seidel, DEQ Mr. Thomas Hess, DEQ