

DDP Specialty Electronic Materials US, Inc.  
3400 S. Saginaw Rd Unit 96  
Midland, MI 48640

DEQ-AQD

SEP 11 2019

SAGINAW BAY



September 9, 2019

CERTIFIED MAIL  
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Chris Hare  
Michigan Department of Environment, Great Lakes, and Energy  
Air Quality Division, Bay City District  
401 Ketchum Street, Suite B  
Bay City, MI 48708

CC: Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260,  
Lansing, Michigan 48909-7760

**RESPONSE TO DDP SPECIALTY ELECTRONIC MATERIALS US, INC. – METHOCEL™  
PRODUCTION UNIT (EUB2-S1), VIOLATION NOTICE**

Attached is a response to the Violation Notice dated August 19, 2019 for the METHOCEL™  
Production Facility (EUB2-S1). The response includes a summary of the corrective actions that  
have been taken to prevent recurrence.

If you have any questions regarding this response, please contact Sara Bennett at (989) 496-  
8057 or by email at [sara.bennett@dupont.com](mailto:sara.bennett@dupont.com).

I certify that, based on information and belief formed after reasonable inquiry, the statements and  
information in this report and the supporting enclosures are true, accurate and complete.

A handwritten signature in black ink that reads "Joe Guerrieri".

Joe Guerrieri  
Michigan Operations Site Leader  
DDP Specialty Electronic Materials US, Inc.  
3400 S. Saginaw Rd Unit 96  
Midland, MI 48640  
(302) 584-8886

Attachment

**Attachment – EUB2-S1 (METHOCEL™) Violation Notice Response**

On July 17, 2019, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of EUB2-S1 (METHOCEL™) located at DDP Specialty Electronic Materials US, Inc. (DDP) in Midland, Michigan, SRN #P1027. EUB2-S1 is an existing emission unit covered under Renewable Operating Permit MI-ROP-A4033-2017b.

DDP received a written violation notice for EUB2-S1 dated August 19, 2019. A written response to the Violation Notice was requested to be submitted to EGLE by September 9, 2019. The following table summarizes the facility's response to the information requested:

Information Requested	DDP Response
Dates of occurrence	On July 23, 2019 DDP confirmed an error in the process control logic for T-1975 scrubber water flow. Due to the passage of time, DDP has been unable to determine the precise length of time that T-1975 scrubber was operating below the minimum water flow rate requirement. DDP was able to determine that the calculation error was present in the process control logic dating back to 2014.
Explanation of the causes and duration of the occurrence	Due to the passage of time, DDP has been unable to determine the precise cause of the error in the process control logic for the water flow to T-1975 scrubber. The most likely cause is that an orifice plate flow meter was previously used to control water flow to T-1975 scrubber and was replaced with the electromagnetic flow meter (that is currently used to measure water flow).
Whether the occurrence is ongoing	The water flow rate for T-1975 scrubber was restored to above the permitted range (10 gpm) on July 23, 2019.
Summary of the actions that have been taken and are proposed to be taken to correct the occurrence and the dates by which these actions will take place	The process control logic was corrected on July 23, 2019 upon discovery of the calculation error.
What steps are being taken to prevent a reoccurrence	The calibration procedure for T-1975 scrubber will be updated to require a 3 point electronic signal verification that the field instrument and process control computer readings match. There is also a plan in place to update the calibration procedures for the other Title V instruments at the EUB2-S1 production facility.

T-1975 scrubber is in active operation for approximately 321 hours per year. Updated emission calculations, using conservative assumptions, were conducted for T-1975 at the reduced water flow rate. Through this review, it was determined that even at the reduced water flow rate, the emissions from T-1975 scrubber are less than the emission calculations contained in the 2006 PTI application.

A calibration audit of all Title V instrumentation located at the METHOCEL™ production facility will be conducted (using the 3 point electronic signal verification) to confirm that the field instrumentation and process control computer readings match. This audit will be conducted to ensure a similar issue does not exist with the other Title V instrumentation devices at the facility.