

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



September 23, 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

DEQ-AQL  
SEP 26 2019  
SAGINAW BAY

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. – SPECIALTY MONOMERS DIVINYLBENENE PROCESS (EU94-S1), VIOLATION NOTICE**

Attached is a response to the Violation Notice dated September 4, 2019 for the Specialty Monomers Divinylbenzene Production Facility (EU94-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, appearing to read "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 – EU94-S1 (Specialty Monomers Divinylbenzene Process) Violation Notice Response**

DDP Specialty Electronic Materials US, Inc. (DDP) in Midland, Michigan, SRN #P1027, operates the Specialty Monomers Divinylbenzene (DVB) process covered under EU94-S1 of Renewable Operating Permit MI-ROP-A4033-2017b.

On August 15 and 16, 2019 the blower on the Sorbathene absorber or PSA (pressure swing absorption) system shutdown, which resulted in emissions of hazardous air pollutants that bypassed the PSA and vented to atmosphere.

On August 16, 2019 DDP, made an initial notification to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) PEAS hotline for a release to atmosphere from EU94-S1. DDP submitted a follow-up Rule R 336.1912 Release Notification for EU94-S1 to EGLE in a letter dated August 22, 2019.

DDP received a written violation notice for EU94-S1 dated September 4, 2019. A written response to the violation notice was requested to be submitted to EGLE by September 25, 2019. The following table summarizes the facility’s response to the information requested:

Information Requested	DDP Response
Dates of occurrence	The blower on the PSA system shutdown at approximately 11:48 pm on 8/15/19 until 9:45 am on 8/16/19.
Explanation of the causes and duration of the occurrence	<p>A manual valve was closed on 8/15/19 at approximately 5:50 pm as part of a maintenance operation to isolate a storage tank. When the manual valve was closed, it allowed water to back up into the blower system on the PSA. The water caused the blower system to trip the electrical circuit resulting in the PSA blowers shutting down at 11:48 pm on 8/15/19. When the blowers were down, vents from six storage tanks were vented to the atmosphere through the flame arrestors on the respective tanks, without first going through the PSA air pollution control device. The remaining process vents were bottled up and contained within the system.</p> <p>At approximately 4:30 am on 8/16/19, operations noticed water in the process area and began trouble shooting; however the blowers on the PSA system were not identified as being offline until approximately 8:00 am. Due to an issue with the process control logic for the PSA blowers, the process control system alarm to notify operations that the blowers were shutdown did not occur.</p>
Whether the occurrence is ongoing	The PSA blower system was restarted at approximately 9:45 am on August 16, 2019.

<b>Information Requested</b>	<b>DDP Response</b>
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	Upon discovery on August 16, 2019, the facility performed maintenance to start the blowers resulting in air emissions being routed through the PSA.
What steps are being taken to prevent a reoccurrence	Process control programming changes were made to notify operations when the blowers shutdown.  Clarifications will be made to the isolation procedure to prevent water from entering the PSA system.

Based on detailed engineering calculations using conservative assumptions, it was determined that no permit limits or reportable quantities were exceeded as a result of this event.