



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
BAY CITY DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 19, 2019

Brian Carroll, Midland EH&S Leader
DDP Specialty Electronics Materials US, Inc.
1381 Building
633 Washington Street
Midland, Michigan 48667

SRN: P1027, Midland County

Dear Mr. Carroll:

VIOLATION NOTICE

On July 17, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of DDP Specialty Electronics Materials US, Inc. (DDP) located at 1381 Building, 633 Washington Street, Midland, Michigan. The purpose of this inspection was to determine 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 Renewable Operating Permit (ROP) number MI-ROP-A4033-2017b.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUB2 Control device T-1975 water scrubber	ROP No. ROP-MI-A4033-2017b EUB2 SC III.3. The liquid flow rate of the vent SVB2029 (scrubber T-1975) packed column water scrubber shall not be less than 10 gallons per minute, based on a daily average scrubber flow.	The T-1975 water scrubber liquid flow meter instantaneous reading was below the required 10 gpm flow and below the flow readout that is used for process control. The facility has no information to demonstrate that the actual flow on T-1975 was a minimum of 10 gpm between 4/30/2017 and 7/23/2019.
EUB2 Control device T-1975 water scrubber	ROP No. MI-ROP-A4033-2017b EUB2 SC VI.1. Install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the liquid flow	Field instrument and process control readout value for T-1975 scrubber liquid flow rate were not same. Field instrument <

	rate for Scrubber T-1975 during periods of the operation of the device resulting in emissions to the T-1975 scrubber.	10 gpm in July 2019. Unable to verify T-1975 scrubber liquid flow 4/30/2017 - 7/23/2019. A calculation error was removed from process control system 7/23/2019.
General Condition 10 Air cleaning device	ROP No. MI-ROP-A4033-2017b GC 10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law.	The facility could not demonstrate that the T-1975 scrubber flow was adequate to operate in a satisfactory manner between 4/30/2017 and 7/23/2019 when receiving exhaust from process operations that require T-1975 to provide control of emissions.

During the inspection the in-field flow meter for the T-1975 water scrubber read out was below the ROP required minimum of 10 gpm and was not the same value as the process control system liquid flow reading of 15 gpm. The process system liquid flow rate is used by the facility to evaluate ongoing compliance with the ROP required minimum flow rate of 10 gpm.

After additional investigation, it was determined that a calculation error in the process control system existed. DDP is unable to demonstrate that the T-1975 scrubber liquid flow was a minimum of 10 gpm for the period of April 30, 2017 through July 23, 2019. This is a violation of the process and operational restrictions specified in General Condition 10, EUB2 Special Condition III.3, and EUB2 Special Condition VI.1 of the monitoring and recordkeeping requirements in the ROP.

The ROP EUB2 Special Condition I. emission table cites the control device T-1975 scrubber as one method used to demonstrate compliance with emission limits for Methyl Chloride, Propylene Oxide, Propylene Glycol Dimethyl Ether, and VOCs when process exhaust is venting to T-1975. During the periods that the T-1975 scrubber is required to be used for control of emissions, the facility operated in violation of Rule 910 of the administrative rules promulgated under Act 451, and 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 September 9, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the

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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.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If DDP 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 DDP EUB2. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Kathy Brewer
Senior Environmental Quality Analyst
Air Quality Division
989 439-2100; brewerk@michigan.gov

cc: Ms. Sara Bennet, DDP
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Chris Hare, EGLE