



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

September 4, 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 August 16, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a notification from DDP Specialty Electronics Materials US, Inc. (DDP), located at 1381 Building, 633 Washington Street, Midland, Michigan. The notification provided information of a release to the atmosphere.

Based on information provided by DDP on August 16, 2019 and in subsequent correspondence dated August 22, 2019, AQD staff determined the following:

Process Description	Rule/Permit Condition Violated	Comments
EU94-S1 Control device Sorbathene adsorber (Pressure Swing Adsorber "PSA")	ROP No. MI-ROP-A4033-2017b EU94-S1 IV.1 limits operation of the process to periods when PSA installed, maintained and operated in a satisfactory manner. The PSA normally sends emissions to cracker H.	Blowers on Sorbathene adsorber or Pressure Swing Absorption (PSA ) system shutdown at 11:48 PM on 8/15/2019 until approximately 8:00 AM 8/16/2019. Uncontrolled emissions were vented to the atmosphere. Process control programming did not alert operations personnel of shutdown.
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 did not operate PSA in a satisfactory manner due to process control programming that lacked adequate notification to operations personnel of equipment failure on the control device between 11:48 PM on 8/15/2019 until approximately 8:00 AM on 8/16/2019.

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The ROP EU94-S1 Special Condition IV.1 requires that portions of EU94-S1 venting to the PSA only be operated when the PSA is installed, maintained, and operated in a satisfactory manner. The PSA is comprised of two carbon adsorber units that alternate operation. The PSA normally discharges to cracker H except when cracker H is down. The permittee is required to monitor the temperature at the top section of each carbon adsorber section.

During the periods that EU94-S1 process emissions were vented to the atmosphere when cracker H was available, 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.

Per DDP correspondence dated August 22, 2019, the process control programming has been changed to notify the operations staff when the PSA blowers shutdown.

No reporting of any air permit emission violations has occurred. Emissions of 3 pounds Benzene (permit limit is 579 lbs/yr); 0.2 pound 1,3-Butadiene, 1 pound Toluene, 0.2 pound Ethylbenzene, 0.5 pound Styrene, <0.05 pound Xylene, and <0.05 pound Naphthalene were reported. The ROP emission limit for total VOC is 1.9 ton/yr

Please initiate any additional actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 25, 2019 (which coincides with 21 calendar days from the date of this letter). 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.

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.

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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 or email listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Brewer". The signature is fluid and cursive, with the first name "Kathy" written in a larger, more prominent script than the last name "Brewer".

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