



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



DAN WYANT  
DIRECTOR

November 23, 2015

Mr. Charles Anderson, Environmental Specialist  
Solutia, Inc.  
5100 W. Jefferson Ave.  
Trenton, MI 48183

SRN: B2155, Wayne County

Dear Mr. Anderson:

**VIOLATION NOTICE**

On August 20, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Solutia, Inc. (Solutia) located at 5100 W. Jefferson Ave., Trenton, Michigan. The purpose of this inspection was to determine Solutia's 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 administrative rules and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B2155-2009a.

As a result of the inspection, staff has observed the following:

Process Description	Rule/Permit Condition Violated	Comments
The stationary source, inclusive of all permitted, exempt, and grandfathered equipment	MI-ROP-B2155-2009a, SOURCE-WIDE, SC I.1;  R 336.1205(2) and (3)	Source Wide limits each individual hazardous air pollutant (HAP) to less than 9.0 tons per year. The reported monthly vinyl acetate emissions combined with the release emissions documented in the deviation report and release reports results in 12-month rolling totals of vinyl acetate greater than 9.0 tons per year beginning in February 2015.

On August 31, 2015 the AQD received from Solutia process emissions data for vinyl acetate from July 2013 through July 2015 via email, with a hard copy postmarked September 1, 2015. The AQD also received from Solutia, postmarked September 15, 2015, a semiannual ROP deviation report for the period January through June, 2015, which detailed releases of vinyl acetate due to equipment malfunctions. For most of these incidents, Solutia had previously either contacted the Michigan DEQ PEAS and an Incident Report was filed or Solutia sent a Spill or Release Report, which listed an estimated release value.

A summary of the reported vinyl acetate emissions is given in the table below.

Vinyl Acetate Emissions from the Stationary Source (all figures are in tons)					
Month	Process Emissions: Monthly & 12- Month Rolling Totals <sup>a</sup>		Date of Release and Amount Reported <sup>b</sup>		12-Month Rolling Total of Process Emissions & Releases <sup>e</sup>
January 2014	0.546	5.78			5.78
February 2014	0.540	5.88			5.88
March 2014	0.456	5.89			5.89
April 2014	0.485	5.78			5.78
May 2014	0.512	5.82			5.82
June 2014	0.656	6.02			6.02
July 2014	0.554	6.04			6.04
August 2014	0.648	6.26			6.26
September 2014	0.266	5.90			5.90
October 2014	0.350	5.83			5.83
November 2014	0.482	5.97			5.97
December 2014	0.569	6.06			6.06
January 2015	0.598	6.11			6.11
February 2015	0.578	6.15	February 19, 2015	1 <sup>c</sup>	9.93
			February 23, 2015	2.775	
March 2015	0.485	6.18			9.96
April 2015	0.475	6.17	April 20, 2015	0.677	10.63
May 2015	0.412	6.07			10.53
June 2015	0.679	6.09	June 17, 2015	None listed	10.65
			June 23, 2015	0.005	
			June 28, 2015	0.096	
July 2015	0.619	6.16			10.71
August 2015		5.51	August 18, 2015	1.268 <sup>d</sup>	11.33
September 2015		5.25			11.07
October 2015		4.90			10.72

<sup>a</sup>Process emissions data based on information received August 31, 2015

<sup>b</sup>Release emissions data from ROP deviation report postmarked September 15, 2015 (unless otherwise noted)

<sup>c</sup>Release incident report of February 21, 2015 PEAS Incident Number 12379

<sup>d</sup>Release incident report of August 18, 2015 PEAS Incident Number 13269

<sup>e</sup>Calculated by AQD

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The release amounts combined with the monthly emission records that were collected during the onsite inspection result in the 12-month rolling total exceeding 9.0 tons of vinyl acetate beginning in February 2015. The 12-month rolling ton continues to exceed 9.0 tons of vinyl acetate through July, which is the last month that process emissions data was collected by the AQD. On August 18, 2015, Solutia, Inc. experienced an accidental release of 1.268 tons of vinyl acetate. Even while excluding emissions from process operations for the months of August, September, and October, the 12-monthly rolling total emissions of vinyl acetate emissions continue to exceed 9.0 tons per year through October 2015.

Special Condition (SC) I.1 of the Source-Wide conditions to MI-ROP-B2155-2009a restricts emissions from each individual Hazardous Air Pollutant (HAP) to less than 9.0 tons per 12-month rolling time period as determined at the end of each calendar month. This special condition originated within Permit to Install No. 376-07 as a mechanism, pursuant to R 336.1205(2) and (3), to limit the potential to emit of HAPs from the stationary source and allow Solutia to operate as an area source of HAP.

Per Section 112(b) of the Clean Air Act, vinyl acetate (CAS# 108-05-4) is a HAP. Beginning February 2015, when annual emissions of vinyl acetate exceeded the limit at SC I.1, Solutia's potential to emit an individual HAP was no longer restricted and Solutia became a major stationary source of HAP. Beginning April 2015, actual emissions of the HAP vinyl acetate exceeded the major source threshold of 10.0 tons per year.

Solutia is in violation of SC I.1, SOURCE-WIDE, MI-ROP-B2155-2009a and R 336.1205(2) and (3). As a result, Solutia is a major stationary source of HAP and must be in compliance with any subpart within 40 CFR, Part 63 now applicable to Solutia as a major HAP stationary source.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 14, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Solutia 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 violation cited above and for the cooperation that was extended to me during my inspection of Solutia, Inc. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jill C. Zimmerman  
Environmental Engineer  
Air Quality Division  
313-456-4689

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ