

October 12, 2016

Ms. Mary Douglas  
State of Michigan  
Department of Environmental Quality  
Air Quality Division  
7953 Adobe Road  
Kalamazoo, Michigan 49009



**RE: NOTICE OF VIOLATION LETTER Received September 23, 2016  
HC Starck (Site ID B1523) in Branch County, Coldwater, MI**

Dear Ms Douglas,

HC Starck has received a Notice of Violation (NOV) letter dated September 23, 2016. Related to an inspection performed by Mr. Dale Turton, Senior Environmental Engineer - Air Quality Division, on August 17 and September 19, 2016. HC Starck wishes to dispute the violations noted and has provided the follow arguments for consideration to said violations.

**Violation #1 - Hexamine Blender:**

At this time it appears that no exemptions exist for the hexamine blender. As such, HC Starck must agree with the NOV assessment for this device. HC Starck will request that the Hexamine blender be added to our existing Permit to Install (346-98A) for the Coldwater, Michigan location. Please allow HC Starck until January 13, 2017 to make this request. HC Starck is asking for this time frame to allow consultation with consultants to ensure that we make all appropriate inquiry and ensure that the Hexamine Blender is appropriately permitted. This timeframe will also allow HC Starck to properly address the additional items mentioned in the inspection report that need clarification in PTI.

**Violation #2 - Harper Furnace:**

HC Starck disagrees with the assessment of the Notice of Violation (NOV) for this item. Was the dust collection system operating outside the range of specified in the permit? Based on your own assessment, as specified on page 3 paragraph 3 in the Activity Report, you are unsure of the meaning and intent of the permit language.

*"Condition 6.4 requires that the permittee shall maintain a low pressure drop of 2-4 inches across EU-HARP. The condition doesn't make sense. What does "a low pressure drop" mean? The pressure differential reading of the collectors showed the baghouses to have about 0.1 inches of water pressure drop, which is not between 2-4 inches. Assuming that the condition is intended to require a reading between 2-4 inches, this is a violation. The permit should be corrected so that this condition is clarified."*

Since the inspecting agency representative could not make sense of the permit condition, and had to make a significant assumption to the meaning of the language within the permit, HC Starck feels that a violation issued for this item is excessive. HC Starck is willing to request an amendment to the permit to make Condition 6.4 more concise and measurable.

During the original inspection, HC Starck made every attempt to verify that the Elinio (the system the MDEQ inspector was inspecting and concerned with) system is operating in a manner that protects the environment and satisfies the MDEQ. The system was verified to be operating as designed. HC Starck maintenance personnel pulled the bags and verified that no bags were leaking and performed maintenance items requested by the MDEQ inspector to verify that the system was operating correctly. The information relating to the bag condition was provided to the MDEQ inspector on the return visit to the site. HC Starck has a maintenance program that insures that systems are operating at peak efficiency at all times.



*Figure 1 - Harper Baghouse Pressure Drop display screen. Two pressure drop readings related to two baghouses.*

Since the MDEQ inspector was concerned with the Elinio system on the first visit, HC Starck believes that the readings mentioned may have been taken from the Elinio rotary furnace and not the Harper. The Harper furnace has two (2) baghouses with separate pressure drop readings for each baghouse. An additional pressure drop reading is measured for the pressure drop across the furnace itself.



*Figure 2 - Elinio Baghouse Pressure Drop display screen. One pressure drop reading related to one baghouse.*

**Violation #3 - Evaporator #3:**

HC Starck disagrees with the assessment of the Notice of Violation for this item. These evaporators were in existence and operational during previous inspections with no Notice of Violation being issued during the previous inspection.

EU-EVAP listed in original permit (346-98A), with the mention of the second evaporator in the 2005 amendments. The third evaporator was installed in 2010 with an exemption. The details of this exemption were presented in a letter dated April 12, 2010 addressed to Ms. Mary Douglas.

The facility was inspected by Fred Harris in 2012, noting that 3 evaporators are installed. No NOV was issued at that time. Since no process changes have occurred, why is this a violation now and not during the previous inspections?

HC Starck greatly appreciates your consideration on the above mentioned items and looks forward to a discussion related to the NOV's received. Should you have any question, or need additional information, please do not hesitate to contact me.

Sincerely;  
HC STARCK



Patrick Houle  
HSE Manager