



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

September 23, 2016

Mr. Patrick Houle, EHS Manager
H.C. Starck Inc.
460 Jay Street
Coldwater, Michigan 49036

SRN: B1523, Branch County

Dear Mr. Houle:

VIOLATION NOTICE

On August 17, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of H.C. Starck Inc. (Facility), located at 460 Jay Street, Coldwater, Michigan. The purpose of this inspection was to determine the Facility'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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) No. 346-98D.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Hexamine Blender	R336.1201 (Rule 201)	Failure to obtain a permit prior to installation.
Harper Furnace	Permit Condition 6.4	Differential pressure across baghouses were out of range.
Evaporator #3	R336.1201 (Rule 201)	Failure to obtain a permit prior to installation.

During the inspection, it was noted that the Facility had installed and commenced operation of the two pieces of equipment listed above in violation of Act 451, Rule 201. A program for compliance may include a completed PTI application for the blender and evaporator equipment. An application form is available by request, or at the following website: http://www.deq.state.mi.us/aps/nsr_information.shtml

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment that may be a source of an air contaminant.

On August 17, 2016, the AQD staff observed operation of the Harper furnace while the dust collector was operating outside the differential pressure range required in the permit. This constitutes a violation of Act 451, Rule 910, 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.

In addition to the need for new permitting, there are several other conditions in PTI No. 346-98D that need to be revised. These are outlined below:

EU-EVAP - Condition 1.4 limits the pounds of ammonium dimolybdate (ADM) throughput in the evaporator. The evaporators are not necessarily processing ADM. That is done in the furnaces. Any ADM entering the evaporators will be trace amounts. The AQD recommends that the Facility ask for a revision to clarify the conditions in the emission unit.

EU-PD-1 - Condition 3.1 requires that dust collector Torit DC-4 be installed and operated. The baghouse that is installed is labelled DC-4. The AQD recommends that the Facility ask for a revision to correct the condition in the emission unit.

FG-EXTRUSION - Dust collector DC-4 serves the GFM furnace that is located in the extrusion area of the plant. The GFM equipment is not currently a part of the permit since it was installed under an exemption. The AQD recommends that the Facility ask for a revision to add this equipment to the permit to simplify compliance and assure that it is accounted for in the plant-wide FG-FACILITY particulate emission totals.

FG-HOTWORKS - There are some pieces of equipment identified as part of this emission group that have been removed from the plant. Also, Permit Condition 5.3 identifies the collector as a "Pangborne." There is not a Pangborne collector at the Facility. The AQD recommends that the Facility ask for a revision to correct the conditions in the emission unit to reflect the current situation.

FG-STAGE1&STAGE2 - Permit Condition 6.8 requires that dust collector Elino DC-4 be installed and operated. The dust collector installed is not referred to as DC-4. Also, Permit Condition 6.4 appears to be worded poorly and needs to be changed. The AQD recommends that the Facility ask for a revision to correct the conditions in the emission unit to reflect the current situation.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 13, 2016 (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 are proposed to be taken to correct the violations; and the dates by which these actions will take place.

Mr. Patrick Houle
Page 3
September 23, 2016

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

Sincerely,



Dale Turton
Senior Environmental Engineer
Air Quality Division
269-567-3554

DT:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ