



GRETCHEN WHITMER
GOVERNOR

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

EGLE
LIESL EICHLER CLARK
DIRECTOR

November 10, 2021

Gerard Manley
Hemlock Semiconductor Operations LLC
12334 Geddes Road
Hemlock, Michigan 48626

SRN: B2644, Saginaw County

Dear Mr. Manley:

VIOLATION NOTICE

On October 27, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received notification from Hemlock Semiconductor Operations LLC (HSC) of emission limit exceedances contained in MI-ROP-B2644-2021. On October 29, 2021, the AQD received a copy of the facility's Excess Emissions Report (EER) detailing the emission exceedances that occurred with EUBOILER10 during the reporting period of July 1, 2021 to September 30, 2021. HSC self-reported the following exceedances:

Process Description	Rule/Permit Condition Violated	Comments
EUBOILER10	S.C. 1.1. NOx limit of 0.037 lb/MMBtu 30-day rolling average time period.	The facility reports excess emissions on 18 days during the reporting period. The duration of excess emissions was 7.062573394% of the total operating time.

The records provided demonstrate that emissions of NOx on a 30-day rolling average time period from the EUBOILER10 process equipment were in exceedance of the permitted limit a total of 18 days during the reporting period of July 1, 2021 to September 30, 2021. The highest 30-day rolling average reported was 0.075 lb/MMBtu NOx. The conditions of MI-ROP-B2644-2021 limit the emissions of NOx to 0.037 lb/MMBtu on a 30-day rolling average time period.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 1, 2021 (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

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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.

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 HSC 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 violation cited. 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,



Nathanael Gentle
Environmental Quality Analyst
Air Quality Division
989-778-0025
GentleN@Michigan.gov

cc: Mr. Jeff Schrems, HSC
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Chris Hare, EGLE