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Department of Environmental Quality
Air Quality Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009-5025
Attn: Mr. Rex Lane

December 13, 2017

Dear Mr. Lane:

This is in response to the Clariant Plastics & Coatings USA Inc. inspection on November 8, 2017 and subsequent Violation Notice for Calcinator (EUCA1530) – permit # 541-88A.

Per special Condition 1.3 of our permit, the requirement was to vent this process vertically upward stack (Max diameter of 24 “) and a minimum exit point of 42 feet above ground level. During some requirement movement of our production equipment the calcinator was moved to another location bay (3) of our manufacturing area and subsequently connected to a main exhaust that vents horizontally and 25 feet above ground level.

It is not clear to us to the exact date when this movement and connection to a different ventilation pipe occurred as this site has experienced multiple changes in maintenance personnel/manager and also Site Management has recently been replaced.

The failure of our past maintenance dept. in not following our internal guideline Management of Change contributed to improper connection for venting purposes, i.e. special condition 1.3 of our permit.

This has been rectified by following our special condition requirements for venting of the calcinator as of 12/12/2017 – please see below.

The pictures show venting straight through the roof and extending 17 feet above roof line, which puts exit discharge approximately 50 feet above ground level.

To ensure this does not occur again – I will conduct retraining of all maintenance staff/site management on our internal MOC (management of change) procedure prior to December 31, 2017.

If you have any questions or need additional information, please contact me at the phone numbers provided.

Sincerely,



Denise Richardson
Regional Process Safety Manager
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