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July 24, 2017

Chemetall US Inc.
1100 Technology Drive
Jackson, MI 49203

RECEIVED
JUL 25 2017
AIR QUALITY DIVISION



Re: **Response to Violation Notice Dated July 7, 2017**

To whom it may concern:

In response to Michigan Department of Environmental Quality correspondence dated July 7, 2017, Antea Group, on behalf of Chemetall US Inc. has developed the following response and corrective actions. Violations were identified during a facility inspection on June 15, 2017.

Observation 1 – 40 CFR Part 63, Subpart VVVVV

- MDEQ Comments
 - The required Notification of Compliance Status report has not been submitted nor has the Company provided information on how they will comply with the emission standards of this federal regulation.
- Corrective Action and Response
 - Facility has drafted a Notification of Compliance Status and submitted to MDEQ and US EPA on July 24, 2017. This document has been attached for reference as **Attachment 1**.

Observation 2 – 40 CFR Part 60, Subpart JJJJ

- MDEQ Comments
 - The Company did not provide documentation that shows that they are in compliance with this federal regulation.
- Corrective Action and Response
 - The facilities Permit To Install No. 88-12D will be amended to include the natural gas fired, emergency generator recently installed at the facility. The Permit amendment request will be submitted by September 30, 2017.
- Causes and Duration
 - The generator was installed and commissioned on February 15, 2016 and operated for 2.8 hours. The generator has not operated as a result of an electrical outage since that time however performs a weekly, automated operations test of 15-minutes in duration.

Observation 3 – PTI 88-12D. SC. III

- MDEQ Comments
 - The Company is not properly implementing the required Malfunction Abatement Plan (MAP) for wet scrubber SC05. Spray nozzles inside the scrubber are not properly aligned.
- Corrective Action and Response
 - The MAP will be amended to accurately reflect the manufacturer’s recommendations with regards to the spray pattern. As detailed in **Attachment 2**, the manufacturer has advised



that spray contacting the scrubber side wall in fact does NOT indicate an abnormality based on the circular spray pattern compared with the rectangular scrubber. The Malfunction Abatement Plan has been amended to indicate that the spray patter should be checked and verified as giving the appearance of a full cone for each nozzle however references to spray contacting the sidewall have been removed. The amended MAP will be submitted to the MDEQ for review and comment by August 31, 2017.

Observation 3 – PTI 88-12D. SC. IV

- Comments
 - Wet scrubber SC05 doesn't have the required pH meter. The gauge that measures pressure drop across the scrubber is not operating properly.
- Corrective Action and Response
 - The facility evaluated the pressure gauge in question and determined that water was trapped within the tubing, thereby causing a false reading. Upon removal of fluids present the gauge returned to within the acceptable range. Based upon daily Preventative Maintenance records, the malfunction occurred on June 13, 2017 and the subsequent repair was completed in the afternoon on June 15, 2017. Going forward, daily operational data will continue to be closely reviewed in order to facilitate a timely repair or response.
 - The requirement to provide continuous monitoring of pH has been previously met through collection of a daily sample. An integrated pH monitor is currently being evaluated further as a means to provide continuous monitoring.
- Causes and Duration
 - The pressure gauge malfunction was determined to have first occurred on June 13 and was subsequently repaired on June 15. The cause was attributed to trapped water droplets within the sensor tubing, the result of normal operations and circulation of water within the scrubber. The daily pH readings have been collected since activation of the scrubber and have been within required limits during that period.

If you have questions regarding this matter, please contact:



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Attachment 1

Notification of Compliance Status

Attachment 2

Manufacturer correspondence regarding Spray Pattern