



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 3, 2024

VIA EMAIL ONLY

Andrew Ault, Vice President of Manufacturing
Hemlock Semiconductor Operations LLC
12334 Geddes Road
Hemlock, Michigan 48626

SRN: B2644, Saginaw County

Dear Andrew Ault:

VIOLATION NOTICE

On September 13, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a Renewable Operating Permit Deviation Report from Hemlock Semiconductor Operations LLC located at 12334 Geddes Road, Hemlock, Michigan. The report was reviewed to evaluate Hemlock Semiconductor Operations LLC 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 Renewable Operating Permit (ROP) number MI-ROP-B2644-2021a.

During the review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGRULE290	MI-ROP-B2644-2021a - FGRULE290 - Special Condition (SC) I.1 and Michigan Air Pollution Control Rule 336.1290(2)(a)(i)	Exceeded the Rule 290 emission limit of 500 lb/month on January 16, 2024.
EUS11ETCH	MI-ROP-B2644-2021a - EUS11ETCH - SC III.1 and IV.1	The caustic scrubber pH dropped below the permit limit for 7 hours on 1 26, April 26, 2024

The facility submitted a Semi-Annual ROP Deviation Report stating that on January 16, 2024, actual emissions of hydrochloric acid vapor, a hazardous air pollutant (HAP), from the FGRULE290 process equipment was 2,697 lbs within a 90-minute time frame. This deviation exceeded the emission limit established by Michigan Air Pollution Control Rule 336.1290(2)(a)(i) and MI-ROP-B2644-2021a, FGRULE290, Special Condition I.1, of 500 lbs/month for noncarcinogenic materials.

The facility reported that after maintenance was completed on the caustic scrubber on April 26, 2024, the scrubber pH dropped below the permitted limit for 7 hours. The facility previously received a letter of violation on March 11, 2024, for a pH level exceedance that lasted for 1.5 hours. In response to that violation notice, the facility indicated that the internal data tracking software, Spotfire, was programmed to include email alerts and that engineering personnel were evaluating the ability to program preemptive alerts or failsafe options into the software for future instances. Response to this violation notice should include insight as to how those efforts did or did not limit the amount of time the scrubber was out of compliance during this event.

The scrubber events constitute violations of Rule 910 of the administrative rules promulgated under Act 451, and SC IV.1 of EUS11ETCH in the facility's ROP which require 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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 24, 2024 (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 have been taken and are proposed to be taken to correct the violations 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 Rachel Benaway at EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or BenawayR@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Hemlock Semiconductor Operations LLC 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.

Andrew Ault
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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Hemlock Semiconductor Operations LLC. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink that reads "Rachel Benaway". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail at the end.

Rachel Benaway
Senior Environmental Quality Analyst
Air Quality Division
269-370-2170

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Gina McCann, EGLE