



December 5<sup>th</sup>, 2023

EGLE

Air Quality Division  
401 Ketchum Street, Suite B,  
Bay City, MI. 48708

Dear Kathy Brewer:

Please accept this letter as Mersen's response to the violation notice that was emailed on November 20<sup>th</sup>, 2023 corresponding to an onsite audit conducted on November 3<sup>rd</sup>, 2023. Below in bold is a summary of the citation that was presented in the violation notice.

**AQD staff observed operation of graphite purification furnaces venting to the dual column F1Scrubber while basicity was below 8.0. This pH level is operating out of the PTI allowed minimum pH range. The pH alarm for the unit had been turned off.**

1. AQD staff observed that the FG-Puriffumaces F1Scrubber pH had returned to pH of greater than 8.0 during the onsite inspection. The chemical pump had malfunctioned and in doing so, caused a disruption in equalizing chemical to be introduced to the scrubber. The pump required maintenance assistance and was working within the hour of failure.
2. It is unknown how the alarm to the unit was silenced. Employees have been retrained on response to alarms.

The violation only occurred during the inspection and was remediated at the time of occurrence.

Sincerely,

Taylor Neid  
Mersen USA GS Corp - Bay City  
900 Harrison St.  
Bay City, MI 48608

Enc.

Copy of violation notice  
Chlorine Scrubber Performance Log for 11/3/23 showing in range readings