



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JACKSON DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

July 7, 2017

**CERTIFIED MAIL – 7010 0290 0000 3734 2194**  
**RETURN RECEIPT REQUESTED**

Mr. Brian Sauer  
Chemetall US, Inc  
1100 Technology Drive  
Jackson, Michigan 49201

SRN: P0359, Jackson County

Dear Mr Brian Sauer:

**VIOLATION NOTICE**

On June 15, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Chemetall US, Inc. (Company) located at 1100 Technology Drive, Jackson Michigan. The purpose of this inspection was to determine the Company's 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) and the associated Air Pollution Control Rules and your Permit to Install (PTI) 88-12D.

During the inspection, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGCRMIX, FGGENMIX, FGOILMX, FGFLMMX, FGSMBATMIX.	40 CFR Part 63, Subpart VVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources	The required Notification of Compliance Status report has not be submitted nor has the Company provided information on how they will comply with the emission standards of this federal regulation.
New 100 kW(134 hp) natural gas fired emergency generator.	40 CFR Part 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	The Company did not provide documentation that shows that they are in compliance with this federal regulation.
FGFLMMX-Mixing tanks associated with the blending of flammable	PTI 88-12D. SC. III. PROCESS/OPERATIONAL RESTICTIONS 1.	The Company is not properly implementing the required Malfunction

products. Emissions are controlled by the flammable liquid product packed bed scrubber.		Abatement Plan (MAP) for wet scrubber SC05. Spray nozzles inside the scrubber are not properly aligned.
FGFLMMX-Mixing tanks associated with the blending of flammable products. Emissions are controlled by the flammable liquid product packed bed scrubber.	PTI 88-12D. SC. IV. DESIGN/EQUIPMENT PARAMETERS 1. & 2.	Wet scrubber SC05 doesn't have the required pH meter. The gauge that measures pressure drop across the scrubber is not operating properly.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 28, 2017. 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.

If the Company 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 violations cited above and for the cooperation that was extended to me during my inspection of this Company. 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,



Mike Kovalchick  
Senior Environmental Engineer  
Air Quality Division  
517-780-5496

cc: Mr. Scott Miller, DEQ  
cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ