

**HEMCO CORPORATION 455 DOUGLAS AVE** 

HOLLAND MI 49424

PHONE: 616-396-4604

FAX: 616-396-0413



September 13, 2018

To:

Tyler Salamasick Ms. Jenine Camilleri

Please accept this response describing the corrective action taken to address the violation notice we received dated August 24, 2018.

In the notice violations of exceedance of 33 dynes level as measured by a tensiometer was noted on:

3-21-2016 Tank 8 1-17-2017 Tank 7 2-10-2017 Tank 7 1-17-2017 Tank 6 4-16-2018 Tank 4

Possible reason for each exceedance is failing to add surface tension additive as specified.

Each exceedance was retested 7 days later, and it was corrected.

The exceedances are not ongoing.

A summary of the actions that have been taken to address the exceedances and will be taken are stated below.

- 1. Updated and trained team members on completion of the Chrome Fume Tensiometer Daily process operations record on Thursday, September 13, 2018. (See attached)
- 2. Thursday, September 13, 2018 trained team members on the appropriate way to perform surface tension testing.
- 3. Thursday, September 13, 2018 trained team members on the appropriate testing schedule if Dynes exceed 33 when testing is done. (Diagram posted in Plate department September 13, 2018, attached)
- 4. Thursday, September 13, 2018 re-trained team members on health, safety and housekeeping for the Plate Department.
- 5. Ongoing review will take place on a weekly basis by Manager of the Plate department through reviewing the daily process operations record. The Manager of the Plate department will initial and date the daily operations record at the time of review. (Effective September 13, 2018)
- 6. Monthly review will take place by Human Resource manager through reviewing the daily process operations record. The Human Resource manager will initial and date the daily operations record at the time of review. (Effective September 13, 2018)

7. If a change in staffing occurs, the Manager of the Plate department will overview the training of the new team member specifically addressing the testing and recording and appropriate procedure if an exceedance occurs. This will be tracked through a training matrix. Completion of the matrix document will be September 28, 2018.

In the notice, housekeeping practices violations were noted related to:

Facility must clean up spills within 1 hour of occurrence.

Facility must clean surfaces within storage areas, open floor areas and walkways around the tanks.

The cause for notation to clean up spills within 1 hour was due to floor dry being on the floor. The cause for the notation to clean surfaces within storage areas, open floor areas and walkways is because we do not currently have drip trays in place. We will be making drip trays and installing them at each tank. This will be implemented by October 31, 2018.

At the time of responding to the violation notice, this is ongoing due to the fact that the drip trays have not been installed yet.

A summary of the actions that have been taken to address housekeeping and will be taken are stated below.

- 1. Thursday, September 13, 2018 re-trained team members on health, safety and housekeeping for the Plate Department.
- 2. Beginning September 12, 2018 completion September 14<sup>th</sup>, 2018, the department is being painted. This will make it visible to the team as to where spills are to be cleaned up.
- 3. Drip trays will be installed on all tanks by October 31, 2018.

If you have any questions, feel free to contact me at 616-340-6517.

Thank you,

Renee Wilson

**Human Resource Manager** 

Marci Wilson