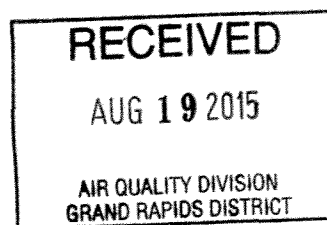




August 13, 2015

Ms. April Lazzaro  
Michigan Department of Environmental Quality  
Air Quality Division  
Grand Rapids District Office  
350 Ottawa Avenue NW – Unit 10  
Grand Rapids, MI 49503-2341



Re: Response to Violation Notice Dated July 27, 2015  
Hutchinson Antivibration Systems, Inc. (SRN No. E5094)

Dear April:

This letter is in response to your Notice of Violation dated July 27, 2015. Hutchinson was disappointed to receive another Notice of Violation. Hutchinson has been working hard to rectify the violations previously noted and to determine the best course of action to deal with the recent stack test results. However, we realize that the MDEQ is unaware of all the work that has been done to date. On August 5, 2015, we provided the MDEQ Enforcement Unit with an update on all of the activities that have or are taking place at the facility. We hope that this response will provide resolution. Following is Hutchinson's response to the individual issues noted in your letter. The item is listed with our response provided below.

- **Failure to comply with applicable requirements of 40 CFR Part 63, Subpart PPPP.**

Hutchinson and Fishbeck, Thompson, Carr & Huber, Inc. (FTCH) worked with the MDEQ Permit Unit to incorporate the coating of plastic parts into Permit to Install (PTI) No. 54-06B. Hutchinson has elected to comply with the facility-specific emission limit option in Subpart MMMM found in 40 CFR 63.3890(c)(2) which incorporates the application of coatings to all substrates not specifically excluded. Compliance with the facility specific emission limit option constitutes compliance with all other National Emissions Standards for Hazardous Air Pollutants (NESHAPs). During the course of the PTI review, it was determined that there were no additional requirements under Subpart PPPP, if this compliance option was utilized. Therefore, the facility is in compliance with PPPP. Starting with the date of the capture efficiency testing (April 16, 2015), Hutchinson has updated the control efficiency in the calculation of their emissions to match the efficiency presented in your letter. The attached table shows that Hutchinson is in compliance with the facility-specific emission limit for the facility and is, therefore, in compliance with Subpart PPPP.

- **Exceedance of VOC emission limit**

Hutchinson has updated the control efficiency used in their volatile organic compound (VOC) emission calculations to be consisted with the efficiency presented in your letter, starting with the date of the stack test. The attached table shows that Hutchinson has not exceeded their VOC emission limit.

- **Failure to maintain a minimum VOC control efficiency of 85%**

On behalf of Hutchinson, FTCH has had discussions with stack testing experts in both the MDEQ and private sector. All of these experts indicated that the liquid to gas capture methodology utilized in our April 16, 2015, test is highly inaccurate. There are many places within this methodology where errors can be made including, but not limited to, weighing of the coatings, lab analysis of the wet coating, and lab analysis of the gas portion in addition to any possible errors in the typical stack testing procedures. Because the usage rates on the individual coating booths at Hutchinson are low, a small error can make a large difference in capture percentage. Because this methodology is highly inaccurate and inconsistent, the MDEQ testing unit typically tries to utilize different methodologies, when allowed.

This problem is evident in the results Hutchinson has seen for previous tests as well. One test performed in the past resulted in a capture efficiency of over 100%.

We make it **possible**

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Ms. April Lazzaro  
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Although Hutchinson cannot pinpoint an exact error in the test that caused the reduced capture efficiency, we feel that the most recent results do not accurately represent our process.

Because the only methodologies allowed under Subpart Mmmm for capture that are appropriate for the processes at Hutchinson are meeting the requirements of Method 204 for a permanent total enclosure or performing the liquid to gas method that provides highly inconsistent results, Hutchinson has decided to hire a coating booth expert to determine if the adhesive machines can be modified to meet the requirements of Method 204. This expert will perform an onsite inspection of the booths and will provide Hutchinson an assessment. We will have the results of the assessment by August 31. If it is not technically feasible to modify the booths to meet the requirements of Method 204, Hutchinson will hire a stack testing firm to redo the capture efficiency test. Hutchinson is currently in the process of installing the continuous monitors for the air flow on each capture system. This monitoring system needs to be up and running prior to any follow-up testing. Hutchinson proposes to re-test, if necessary, 60 days after all the monitoring is in place and determined to be fully operational. We expect the system to be operational by September 15 and the testing to be performed by November 15.

In addition, Hutchinson has hired a ventilation expert to inspect the duct work that captures emissions from the coating booths and conveys it to the RTO. This expert will make sure there are no leaks or gaps in the duct work that may affect capture, and will also verify that the system is properly balanced to get adequate draw at each adhesive machine.

- **Failure to properly operate the air cleaning device**


Hutchinson's system includes duct work. MDEQ mentioned observation of considerable air infiltration in the area of ductwork outside the plant. The areas of concern brought to our attention during the inspection include an area where the cladding of the insulation of the ductwork was damaged (not the ductwork itself) and a filter box which was questioned after observation of "swelling" and "shrinking" as the valves actuated. We have visually inspected the exterior of the system and we are having a third party perform a complete inspection and will repair or replace areas which are identified as risk of leak / air infiltration as soon as possible following discovery.

If you have any questions or require additional information, please contact our consultant, Sue Kuieck with FTCH at 616.446.2496 or [slkuieck@ftch.com](mailto:slkuieck@ftch.com).

Sincerely,

HUTCHINSON ANTIVIBRATION SYSTEMS, INC.

Eric Jamet

 08/14/2015

lkj

Attachments

By email and USPS

cc/att: Ms. Heidi Hollenbach – MDEQ-AQD  
Mr. Jim Todoroff – Hutchinson  
Mr. Walt Jenkins – Hutchinson  
Mr. Jim Niesen – Hutchinson  
Ms. Lynn M. Spurr – FTCH

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