



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT  
DIRECTOR

December 15, 2014

Mr. Jim Niesen  
Hutchinson Antivibration Systems, Inc.  
460 Fuller Avenue NE  
Grand Rapids, Michigan 49503

SRN: E5094, Kent County

Dear Mr. Niesen:

**VIOLATION NOTICE**

On December 4, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Hutchinson Antivibration Systems, Inc. located at 460 Fuller Avenue NE, Grand Rapids, Michigan. The purpose of this inspection was to determine Hutchinson Antivibration Systems, Inc.'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); the administrative rules; and Renewable Operating Permit No. MI-ROP-E5094-2012b.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Rubber-to-metal surface coating operations	MI-ROP-E5094-2012b, EURTO, Special Condition (SC) V.1	Failure to conduct a capture efficiency test in the past 5 years
Rubber-to-metal surface coating operations	MI-ROP-E5094-2012b, FGMMMM, SC III.1.a 40 CFR 63.3967(a)	Failure to maintain average combustion temperature above limit
Rubber-to-metal surface coating operations	MI-ROP-E5094-2012b, FGMMMM, SC VI.4.a.(i-iii) 40 CFR 63.3963(c)	Failure to determine the average of all recorded readings for each successive 3-hour period
Rubber-to-metal surface coating operations	40 CFR 63.3963(c)	Failure to demonstrate continuous compliance with operating limit for the RTO combustion temperature
Rubber-to-metal surface coating operations	MI-ROP-E5094-2012b, FGMMMM, SC III.3; 40 CFR 63.3900(c)	Failure to develop and implement a written startup, shutdown and malfunction plan for capture system

Process Description	Rule/Permit Condition Violated	Comments
Rubber-to-metal surface coating operations	MI-ROP-E5094-2012b, FGMMMM, SC III.4  40 CFR 63.3900(a)(2)(ii)  40 CFR 63.3968(a)	Failure to properly operate continuous parameter monitoring system (CPMS) for the add-on control device
Rubber-to-metal surface coating operations	MI-ROP-E5094-2012b, FGMMMM, SC VI.7  40 CFR 63.3968(a)	Failure to install and operate properly CPMS for the emission capture system
Rubber-to-metal surface coating operations	40 CFR 63.3965(b)	Failure to determine emission capture system efficiency
Rubber-to-metal surface coating operations	40 CFR 63.3967(f)	Failure to establish emission capture system operating limits.
Rubber-to-metal surface coating operations	40 CFR 63.3963(c)	Failure to demonstrate continuous compliance with operating limit for emission capture system
Rubber-to-metal surface coating operations	40 CFR 63.3890(b)(4)	Failure to comply with organic HAP emission limit
Rubber-to-metal surface coating operations	MI-ROP-E5094-2012b, FGMMMM, SC VII.4  40 CFR 63.3963(c)(1);  40 CFR 63.3920(a)(7)	Failure to report deviations
Rubber-to-metal surface coating operations	40 CFR 63.3920(c)	Failure to take action consistent with the startup, shutdown and malfunction plan
Rubber-to-metal surface coating operations	40 CFR 63.3920(c)	Failure to submit startup, shutdown, and malfunction report

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 8, 2015. 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.

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If Hutchinson Antivibration Systems, Inc. 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 Hutchinson Antivibration Systems, Inc.. 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, appearing to read 'April Lazzaro', written in a cursive style.

April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
616-356-0248

cc: Ms. Heidi Hollenbach, DEQ  
cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ

