



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

July 27, 2015

Mr. Eric Jamet
Hutchinson Antivibration Systems, Inc.
460 Fuller Avenue, NE
Grand Rapids, Michigan 49503

SRN: E5094, Kent County

Dear Mr. Jamet:

VIOLATION NOTICE

On July 22, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a review of information provided by 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 rule; the conditions of Permit to Install (PTI) number 54-06B; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-E5094-2012B.

During the review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Rubber-to-plastic surface coating operations	40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products	Failure to comply with applicable requirements of 40 CFR Part 63, Subpart PPPP
FGRT0	PTI No. 54-06B, FGRT0, Special Condition I.1	Exceedance of VOC emission limit
FGRT0	PTI No. 54-06B, FGRT0, Special Condition IV.3	Failure to maintain a minimum VOC control efficiency of 85 percent
FGRT0	PTI No. 54-06B, FGRT0, Special Condition IV.3; Rule 910	Failure to properly operate the air-cleaning device

The rubber-to-plastic surface coating process is subject to the federal NESHAP for Surface Coating of Plastic Parts and Products. These standards are found in 40 CFR Part 63, Subpart PPPP. Hutchinson Antivibration Systems, Inc. has stated that the Grand Rapids facility has been coating plastic parts since 2008, but has not complied with the required elements of 40 CFR Part 63, Subpart PPPP.

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On June 29, 2015 the AQD received a stack test report summarizing the results obtained during capture efficiency and destruction efficiency testing at the facility. The results of these tests are combined to provide a total control efficiency value in percent. The AQD Technical Programs Unit staff reviewed the results and determined a total control efficiency of 77.6%. This is below the 85% as required in PTI No. 54-06B [and ROP No. MI-ROP-E5094-2012b].

In utilizing the 77.6% total control efficiency, it is determined that actual emissions of Volatile Organic Compounds from the metal and plastic parts coating process equipment are over 69 tons on a 12-month rolling time period, which exceeds the permit limit of 50.4 tons per 12-month rolling time period.

During the April 16, 2015 capture efficiency and destruction efficiency test, AQD staff observed considerable air infiltration in to the duct as it comes out of the building, before the oxidizer. Due to the fact that the ductwork is an integral component to a control system, this constitutes a violation of Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 16, 2015 (which coincides with 21 calendar days from the date of this letter). 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 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,



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

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ