

From: [McCann, Gina \(EGLE\)](#)
To: [Irwin, Andrea \(EGLE\)](#)
Subject: FW: Porex Technologies Parts Washer Compliance Plan
Date: Wednesday, February 14, 2024 1:26:05 PM
Attachments: [image004.png](#)
[image005.png](#)
[image006.png](#)
[Washer modifications.pptx](#)

Fyi. I printed, but I know you need for posting.

Gina L. McCann

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Coming soon for industrial stakeholders!



From: Lagerstrom, Norman (Mitch) M <NLagerstrom@jjkeller.com>
Sent: Tuesday, February 13, 2024 4:57 PM
To: McCann, Gina (EGLE) <McCannG2@michigan.gov>
Cc: Kevin Miller <Kevin.Miller@filtrationgroup.com>; Ben Thornton <ben.thornton@filtrationgroup.com>; Andrew Rourke <andrew.rourke@filtrationgroup.com>; Roberts, Heather A <HRoberts@jjkeller.com>
Subject: Porex Technologies Parts Washer Compliance Plan

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Gina,

Porex Technologies would like to thank you for the assistance you have provided throughout this process to ensure the parts washer or cold cleaner being used is complying with the state regulations. The Department of Environment, Great Lakes, and Energy (EGLE) violation letter provides a reasonable timeline of 21 calendar days from the date of the letter or January 29, 2024. Providing a deadline of February 19, 2024 for this response. The violation issued identifies two regulations of concern for compliance, R 336.1707(2) and (3). Porex Technologies notes that R 336.1707(2) contains three options, any one of which can be used to demonstration compliance while R 336.1707(3) contains three requirements where each new cold cleaner must demonstrate compliance.

[Compliance with R 336.1707\(2\)](#)

The company has evaluated the three options under R 336.1707(2) and determined that it can most easily comply with the freeboard option under R 336.1707(2)(a). This option will require the parts washer to be modified as shown in the attached figure. Namely, welding sheet metal extensions onto each side of the parts washer to extend the length of the opening in order to achieve the design requirement (“[...] the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7.”).

Given the parts washer width of 25” the amount of freeboard needs to be 17.5” or more. Currently the parts washer height is 16”, requiring the extensions to be installed to limit air currents over the vapor and meet the requirement. Additionally, in order to ensure proper and safe operation, the legs of the parts washer will be shortened to aid employees in reaching parts without tipping the parts washer.

Compliance with R 336.1707(3)

Porex Technologies will comply with all three requirements under this regulation. Because the solvent is heated this will require installation of a mechanical hinge on the existing parts washer under R 336.1707(3)(a). The mechanical assist is shown on the attached diagram. Equipment cleaned in the parts washer are already utilizing a device to drain cleaned parts in accordance with R 336.1707(3)(b). This equipment will continue to be utilized and parts drained for the required period of time. Finally, waste solvent is stored only in closed containers and will continue being stored in only covered containers as required under R 336.1707(3)(c).

Timeline

If EGLE agrees with the proposed direction to attain compliance, the modifications are expected to be completed by the end of April 2024. If EGLE has any concerns about this approach, please communicate those concerns with everyone included on this email.

Thank you again for your assistance throughout this process.



Mitch Lagerstrom
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