



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

June 15, 2021

Mr. Andy Szakal
Centurion Medical Products
301 Catrell Drive
Howell, Michigan 48843

SRN: N5109, Livingston County

Dear Mr. Szakal:

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) has received and reviewed the May 12, 2021 response, as well as the June 1, 2021 supplemental response to the April 22, 2021 Violation Notice. The supplemental response was submitted on your behalf by Mr. Jon Byl, to address the air quality violation identified at your facility.

With regard to the submitted letters and corrective actions identified, the AQD is requesting the following additional information, in an effort to gain a better understanding of the proposed actions.

1. Centurion identified four items under the heading, "Actions in Progress". The AQD requests that Centurion provide a timeline for the completion of each of these items.
2. Please identify all wall and ceiling openings that are planned to be sealed. Provide a map with the location of each opening clearly identified, as well as information on their purpose.
3. The AQD requests a site-specific plan detailing how Centurion intends to close off the doors to the staging area to ensure a permanent total enclosure.
4. Centurion is proposing to conduct a fugitive emission study to understand the potential to emit of the facility. During previous conversations between AQD and company representatives, the use of Fourier-transform infrared spectroscopy (FTIR) to quantify in-plant emissions was discussed. Is Centurion still planning to use this monitoring method to quantify fugitive emissions? If so, provide a detailed plan on how this test will be conducted and include a timeline for the study. Also, please provide updated potential to emit calculations for submittal to AQD once the emission testing is complete.
5. Centurion has identified the use of Performance Specification (PS) 9 for the outlet of the dry bed scrubber control device. A review of PS 9, Section 6.2 and 8.4 state, in part, the following requirements for the sampling system.

6.2 Sampling System. The sampling system shall be heat traced and maintained at a minimum of 120 °C with no cold spots. All system components shall be heated, including the probe, calibration valve, sample lines, sampling loop (or sample introduction system), GC oven, and the detector block (when appropriate for the type of detector being utilized, e.g., flame ionization detector).

8.4 Performance Audit Test Periods. Conduct the performance audit once during the initial 7-day CE test and quarterly thereafter. Performance Audit Tests must be conducted through the entire sampling and analyzer system. Sample and analyze the EPA audit gas(es) (or the gas mixture) three times. Calculate the average instrument response. Results from the performance audit test must meet the requirements in sections 13.3 and 13.4.

Please confirm that Centurion is:

- Utilizing a heat traced sampling system and heated calibration valves of the ETO-005 – SRI GC monitor at the facility in accordance with PS-9.
- Conducting quarterly performance audits through the entire sampling system in accordance with PS-9.

Thank you for your attention to the requests listed above. If you have any questions, please contact me at the number listed below.

Sincerely,



Samantha Davis
Environmental Quality Analyst
Air Quality Division
517-282-1373

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Brad Myott, EGLE