N6452 - KVN_ 2016 04 29

Advanced Heat Treat Corp.

1625 Rose St., Monroe, MI 48162
734/243-0063 • FAX 734/243-4066

http://www.ahtweb.com

April 28, 2016

Mr. Brian Carley
Environmental Quality Specialist
Air Quality Division
301 East Louis Glick Highway
Jackson, MI 49201-1556

Dear Brian,

Please find this submittal as our written response to your LOV dated April 18th 2016. I have enclosed our report, which was also given to you during your on-site visit back in March. In addition, the information you requested per our recent phone conversations has been added. I appreciate your assistance in this matter and look forward to hearing back from you.

If you have any further questions or concerns, please do not hesitate to contact me at your convenience.

Best Regards,

Jeff Machcinski
V.P of Engineering and Plant Manager

Enclosures

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ADVANCED HEAT TREAT CORP

(5) The written reports required under this rule shall be submitted within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the following information:

(a) The time and date, the probable causes or reasons for, and the duration of the abnormal conditions, start-up, shutdown, or malfunction.

It is believed the leak occurred over a two-month period of time. This occurred during the period of Jan. 1, 2016 through March 1, 2016. The leak was caused by a failure of the pipe fittings located at the bottom of the machine near the flushing pump. The leak was not a constant, it was in a drip type form that was affected by the thermal cycling of the solvent in the machine. Therefore, it would not have been always noticeable.

(b) An identification of the source, process, or process equipment that experienced abnormal conditions, was started up or shut down, or which malfunctioned and all other affected process or process equipment that have emissions in excess of an applicable requirement, including a description of the type and, where known or where it is reasonably possible to estimate, the quantity or magnitude of emissions in excess of applicable requirements.

The leak was from the serial number D-934D1-115 – Model T1-144E vapor degreaser. This is the only process at AHTC that uses trichloroethylene (TCE). Emissions are estimated by comparing the TCE used in the degreaser for January and February 2016 to the average monthly TCE usage for calendar years 2014 and 2015. Estimated release quantity is summarized in the table below.

	Average monthly TCE emissions in 2014 and 2015	
2014 avg	840 lb	
2015 avg	953 lb	
2 year avg	897 lb	
Estimated TCE released	1093 lb	Jan-16 = (1990- 897) lbs
	1083 lb	Feb-16 = (1960- 897) lbs
Total estimated release	2177 lb	lbs TCE released over 60 days 24/7
Gal TCE released	178.78 gal.	released over 60 days
GPH TCE released	0.12 GPH	
ml/min	7.83	

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(c) Information describing the measures taken and air pollution control practices followed to minimize emissions.

Once the leak was discovered, it was immediately repaired and the excess emissions ceased. Because the leak was small, it went undiscovered during the two months of operation, but was noticed when the 12 month rolling average of TCE usage went abnormally high. We have trained our employees on the maximum amount of solvent that the unit can use and not to go over that.

(d) For abnormal conditions and malfunctions, the report shall also include a summary of the actions taken to correct and to prevent a reoccurrence of the abnormal conditions or malfunction and the time taken to correct the malfunction.

A visual inspection procedure is being initiated to train operators to inspect the degreaser thoroughly at the start of each shift to determine if there are any abnormal leaks. Any leaks discovered are to be repaired immediately and notification to the management team.

(6) Actions taken to correct and to prevent a reoccurrence of an abnormal condition or a malfunction shall become a part of any preventative maintenance and malfunction abatement plan required by R 336.1911.

No preventative maintenance or malfunction plan is required for this emission unit at this time.

(7) The truth, accuracy, and completeness of the written reports required under this rule for a stationary source subject to the requirements of R 336.1210 shall be certified by a responsible official in a manner consistent with the clean air act.

As the person operating the process described in Permit to Install 281-01, and based on information and belief formed after reasonable inquiry, the statements and information in this release notification are true, accurate, and complete.

Jeff Machcinski, V.P. of Engineering and Plant Manager
Advanced Heat Treat Corp. Monroe, MI

Signature _____ Date 4/28/16