

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

E509473584

FACILITY: Hutchinson Antivibration Systems, Inc.		SRN / ID: E5094
LOCATION: 460 Fuller Ave. NE, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Jack Turner , Plant Manager		ACTIVITY DATE: 08/20/2024
STAFF: April Lazzaro	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

Air Quality Division staff, April Lazzaro, conducted an unannounced, scheduled inspection of Hutchinson Antivibration Systems Inc. located at 460 Fuller Avenue in Grand Rapids. The purpose of the inspection was to determine the facility's compliance with state and federal air pollution regulations as well as Renewable Operating Permit (ROP) No. ROP-MI-E5094-2024. Accompanying AQD was Jack Turner, Plant Manager, George Ebeling, Industrialization Manager and Darin Bollaert, Maintenance Manager. Records were provided by Sue Kuieck of Fishbeck. Upon arrival at the facility no odors or visible emissions were identified.

FACILITY DESCRIPTION

Hutchinson Antivibration Systems, Inc. manufactures a variety of anti-vibration parts, which consist of rubber, metal, and plastic components, for the automotive and truck industry. The rubber is manufactured on site using both natural and synthetic materials and various types of binders. Metal and plastic components are manufactured elsewhere and shipped to the facility. After primers and adhesives are applied to the metal and plastic components in one of five spray systems, the rubber and metal components are then bonded under heat and pressure in a vulcanization process. Volatile organic compound (VOC) emissions from the process are controlled by a regenerative thermal oxidizer (RTO). Since the last inspection, the facility has installed 11 plastic injection molding cells and a rubber injection cell labeled RC-02.

The facility is a major source of hazardous air pollutants (HAPs) and is also subject to 40 CFR Part 63, Subpart Mmmm National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products; 40 CFR Part 63, Subpart Pppp NESHAP for Surface Coating of Miscellaneous Plastic Parts; 40 CFR Part 63, Subpart Zzzz NESHAP for Reciprocating Internal Combustion Engines; 40 CFR Part 63, Subpart DDDDD NESHAP for Industrial Boilers; and 40 CFR Part 64 Compliance Assurance Monitoring (CAM).

During the compliance period evaluated, the facility operated under multiple permits. MI-ROP-E5094-2018 was issued on October 21, 2018, and was in effect through August 19, 2024. Permit to Install No. 49-18A was issued on October 20, 2021, and was in effect through August 19, 2024, when it was incorporated into the ROP. The facility currently operates pursuant to the provisions contained in MI-ROP-E5094-2024 which was issued on August 20, 2024, and is in effect until permit renewal. Where conditions of the permits identified above were the same, compliance with MI-ROP-E5094-2024 was evaluated.

COMPLIANCE EVALUATION

EUCARBON

This emission unit consists of a carbon black transport system which gravity feeds carbon from trucks to a hopper. Then the carbon black is pneumatically transferred from the hopper to one of four silos with baghouse filters. The unloading area is enclosed within a building and the baghouse vents into this building. The transfer of the carbon black is also ducted to the main system production lines, and as such can also be controlled by either the EUMIX or EURUBBERMIX2 collectors, depending on how much equipment is in operation at any one time. A malfunction abatement plan (MAP) is required, and weekly and quarterly maintenance records were requested and reviewed for the time period of July 2023-July 2024. The company is monitoring and recording non-certified visible emission observations when loading is occurring; there have been no documented visible emission problems. The pressure drop on the Torit baghouse at the time of the inspection was 0.9-1.0" H₂O. A review of records found that the company is recording pressure drop on a daily sheet as well as weekly on the monthly inspection sheet. During the review, it was immediately noted that the values on the two sheets are not similar. For example, the daily sheet pressure drop values range from 1.3-1.9" H₂O. The weekly records on the monthly inspection sheet range from 1.0-1.2" H₂O. This discrepancy was discussed with Al Gatt at the company who stated that he would look into it and provide additional training to the maintenance staff conducting the inspections. No issues were identified, and no comments were entered on any of the monthly inspection sheets. Hutchinson was unable to provide information related to the first and second quarter 2024 maintenance checks. This is a violation of MI-ROP-E5094-2024, Special Condition VI.1. A Violation Notice will be issued.

Additionally, a review of the MAP was conducted, and it was found to be insufficient. Rule 911(1)(b) requires that the company identify the normal operating range of the baghouse variables. However, Hutchinson's plan does not identify a range. For EUCARBON, the plan does not include any pressure drop operating range. The AQD will request that Hutchinson resubmit the MAP with an operating range identified.

EUMIX

This emission unit consists of four rubber mills and one mixer controlled by a baghouse. The baghouse is referred to as the "Fuller" baghouse. The baghouse is clearly ageing, however the area around the unit appeared clean.

Emissions are limited to 1.44 lbs. per hour based on a monthly average which is calculated using actual operating hours for that month, and 6.29 tons per 12-month rolling time period. The facility appears to be tracking the hours of operation on a monthly basis, which was provided in the recordkeeping spreadsheet. The permit summary tab contains the 12-month rolling total emissions; however, no formula is present, and the reported emissions do not align with the values in the spreadsheet. For example, the company is reporting that the emissions for the 12-month period ending in July 2024 are 2.53 tons. This value is entered in the spreadsheet for the periods ending in August and September 2024, even though data does not exist for those months in the recordkeeping. The calculated value based on the emission factor of 1.04 pounds/hour * hours of operation for the period ending in July 2024 is 2.20 tons. Looking back at previous 12-month rolling totals, using the period ending in May 2024, the company reported 2.54 tons, when the calculated emissions are 2.3

tons. Since the company is overreporting emissions, this will not be cited as a violation, but the recordkeeping must be corrected.

A malfunction abatement plan (MAP) is required, and weekly and quarterly maintenance records were requested and reviewed for the time period of July 2023-July 2024. The company is monitoring and recording non-certified visible emission; there have been no documented visible emission problems. The pressure drop on the Fuller baghouse at the time of the inspection was 5.1" H₂O. A review of records found that the company is recording pressure drop on a daily sheet as well as weekly on the monthly inspection sheet. During the review, it was immediately noted that the values on the two sheets are not similar. For example, the daily sheet pressure drop values range from 3.0-3.9" H₂O. The weekly records on the monthly inspection sheet range from 3.9-4.7" H₂O. This discrepancy was discussed with Al Gatt at the company who stated that he would look into it and provide additional training to the maintenance staff conducting the inspections. No issues were identified, and no comments were entered on any of the monthly inspection sheets. Hutchinson was unable to provide information related to the first and second quarter 2024 maintenance checks. This is a violation of MI-ROP-E5094-2024, Special Condition VI.1. A Violation Notice will be issued.

Additionally, a review of the MAP was conducted, and it was found to be insufficient. Rule 911(1)(b) requires that the company identify the normal operating range of the baghouse variables. For EUMIX, the plan does not include any pressure drop operating range, but does say the value should be <6.5" w/c. This is not a range and as such is not adequate. The AQD will request that Hutchinson resubmit the MAP with a normal operating range identified.

EUWHEEL

This emission unit consists of a wheelabrator tumblast (shot blast) unit controlled by a baghouse (located inside the building but exhausted out). A malfunction abatement plan (MAP) is required, and weekly and quarterly maintenance records were requested and reviewed for the time period of July 2023-July 2024. The company is monitoring and recording non-certified visible emission observations; there have been no documented visible emission problems. The pressure drop on the wheelabrator baghouse at the time of the inspection was 0.46" H₂O. A pressure drop of 0.46" H₂O, is typically lower than an acceptable value. A review of records found that the company is recording pressure drop on a daily sheet as well as weekly on the monthly inspection sheet. During the review, it was immediately noted that the values on the two sheets are not similar. For example, the daily sheet pressure drop values range from 0.45-1.50" H₂O. The weekly records on the monthly inspection sheet range from 0.8-1.4" H₂O. This discrepancy was discussed with Al Gatt at the company who stated that he would look into it and provide additional training to the maintenance staff conducting the inspections. No issues were identified, and no comments were entered on any of the monthly inspection sheets. Hutchinson was unable to provide information related to the first and second quarter 2024 maintenance checks. This is a violation of MI-ROP-E5094-2024, Special Condition VI.1. A Violation Notice will be issued.

Additionally, a review of the MAP was conducted, and it was found to be insufficient. Rule 911(1)(b) requires that the company identify the normal operating range of the baghouse variables. For EUMIX, the plan does not include any pressure drop

operating range, but does say the value should be < 2.5" w/c. This is not a range and as such is not adequate. The AQD will request that Hutchinson resubmit the MAP with a normal operating range identified.

FGRTO

FGRTO consists of two (2) automated chain-on-edge spray lines, three (3) Silver spray lines, and four (4) adhesive coating lines all used to coat metal and plastic parts identified as EUSIL01, EUSIL02, EUSIL03, EUCOE01, EUCOE02, EUPR1, EURC1, EURC2, EURC3. The VOC emissions from these nine (9) lines are controlled by a common regenerative thermal oxidizer and the emission units are subject to Compliance Assurance Monitoring (CAM).

During the inspection I was told that the following emission units are not operational: EUPR1, EURC1, EURC2 and EURC3, however the facility is reporting emissions from them. This was also discussed with Al Gatt, who stated that the processes are not operational. A follow up conversation was held with the consultant who discovered that when the 2024 spreadsheets were created, the 2023 emissions were accidentally cut and pasted into the 2024 months. There are no emissions from these units during the time period evaluated since they have not been operational.

Emission limits apply to the entire flexible group, as well as a subset, as further described.

VOC emissions from FGRTO are limited to 50.4 tons per year, based on a 12-month rolling time period. Reported VOC emissions from FGRTO for the 12-month time period ending in July 2024 are 23.38 tons. VOC emissions from EUPR1, EURC1, EURC2, and EURC3 combined are limited to 23.6 tons per year, based on a 12-month rolling time period. While the spreadsheet contains VOC emissions for these emission units there are no emissions associated with these units since they have not operated. The same subset has emission limits for ethylbenzene at 2.3 tons per year and methyl isobutyl ketone of 11.0 tons per year, both on a 12-month rolling time period. While the spreadsheet contains ethylbenzene emissions and methyl isobutyl ketone emissions, there are no emissions associated with these units since they have not operated.

A comparison of the data in the spreadsheet and emissions reported to the emissions inventory was conducted and found that the submittal appears to under report emissions by a little more than one ton of VOC. This appears to be an error due to an incorrect VOC destruction efficiency used in that tab of the spreadsheet as it refers to the 2016 test and not the 2019 test results which was lower.

Suggestions for improvements were made related to the handling of solvents and waste materials in the solvent storage area. This was reported as a deviation of FGRTO as appropriate.

The permit requirements include the implementation of a MAP for FGRTO. The current MAP does not include provisions for COE2. This is a violation of MI-ROP-E5094-2024, Special Condition III.4. A Violation Notice will be issued, and an updated MAP will be requested.

MI-ROP-E5094-2018 required that the permittee determine overall VOC control efficiency, the capture efficiency of the emission units in FGRTO and the destruction

efficiency of the RTO, in FGRT0, once every five years. Additionally, MI-ROP-E5094-2024 required that the permittee determine overall VOC control efficiency, capture efficiency and destruction efficiency of the RTO, in FGRT0, within 180 days of start up of EUCE2, as well as once every five years from the most recent test. Hutchinson has not conducted stack testing on FGRT0 since July of 2019, as such this is a violation of MI-ROP-E5094-2018, Special Condition V.2 and MI-ROP-E5094-2024, Special Condition V.2. A Violation Notice will be issued.

The coating lines were observed during the inspection, and it was noted that while COE02 was not operational during the inspection, there was an overwhelming odor of solvents between the booth and the exterior wall of the facility. Hutchinson staff indicated that they would investigate right away. This was discussed further with Jack Turner, Plant Manager who stated that he believes the odors were caused by the system air being unbalanced. They are scheduling a company to come in and rebalance the system the first week of October and conduct the required interlock testing once the balancing is completed. At the time of this report, the required two week advance notice had not been received, although I was told that the system rebalancing would take place the first week of October 2024.

During the inspection, the coating equipment and the RTO were visually inspected. The RTO was operating at 1,611°F which is above the permitted limit of 1,450°F minimum operating temperature that was established during the most recent performance test. The facility continuously monitors and records the temperature of the RTO. According to the MAP there is an alarm that will shut down all operations if the RTO temperature is below 1,475°F, this is referred to in the permit as the interlock system.

The permit requires that the company verify the operational integrity of the interlock system that shuts down spray booth operations when the temperature of the RTO drops below the minimum temperature requirement every two years. The facility last conducted this test on December 17, 2021. As such, this is a violation of MI-ROP-E5094-2024, Special Condition V.3. A Violation Notice will be issued.

Temperature records were reviewed for the previous 12 months. Two individual readings in August 2023 were in the negative range, and the company treated those like false readings/errors. No other temperature readings were below the allowable value. Temperatures routinely operate in the 1,600°F and up into the 1,800°F range, which is towards the upper end of safe range. The visual inspection did not show any obvious hotspots or other indications of internal damage; however, the unit should be inspected by a professional. It seems unusual to be operating at these temperatures routinely since it was operating at 1,475°F during the last compliance test if it were operating at maximum routine operating conditions at that time.

EUSIL01 is not considered a Permanent Total Enclosure (PTE) so the company is monitoring airflow as a compliance monitoring parameter, it was not running during the inspection. According to the MAP, the air flow must be greater than 3,229 cubic feet per minute (CFM). If that value is not achieved, the system is programmed to automatically shut down. Data was requested for air flow measurements for the time frame of July 2023-July 2024. The 2023 data was reviewed, and a variety of deviations were noted, some of those were anticipated due to the information contained in the deviation report for that period. Further review of that information found that a deviation appeared to have occurred on December 23, 2023, and was not

reported. The 2024 data was reviewed, and the records show that January 2024 had 20 deviations, February had 18 deviations, March had 2 deviations, April had no deviations, there is no data available for May, June had 1 deviation. Hutchinson reported these as deviations of MI-ROP-E5094, FGRT0, Special Conditions III.5-6 and VI 9-10. A Violation Notice will be issued. The reason there is no data for May is that the information is emailed to the facility contact, and only saved for 15 days before it is overwritten. The employee it was emailed to, was no longer employed at the company and it was not able to be retrieved. This missing data is a violation of MI-ROP-E5094-2024, Special Condition VI.16. A Violation Notice will be issued.

EUSIL02 is considered a PTE, and it was running during the inspection. According to the MAP, the air flow must be greater than 236 CFM. If that value is not achieved, the system is programmed to automatically shut down. Data was requested for air flow measurements for the time frame of July 2023-July 2024. Further review of that information found that 8 deviations appeared to have occurred on December 23, 2023, and were not reported. Hutchinson reported these as deviations of MI-ROP-E5094, FGRT0, Special Conditions III.5-6 and VI 9-10. A Violation Notice will be issued. No additional deviations were noted in 2024, however there is no data available for May 2024, because the data is no longer retrievable as noted above. This missing data is a violation of MI-ROP-E5094-2024, Special Condition VI.16. A Violation Notice will be issued.

EUSIL03 is considered a PTE and was operating during the inspection. The facility is monitoring exhaust airflow and calculating facial velocity using the natural draft opening (NDO) area determined during the last capture test. No deviations were noted in the 2023 data. The 2024 data however is believed to contain errors due to issues with the wires, as each day of operation for the months of January - March show that it is in non-compliance. Hutchinson reported these as deviations of MI-ROP-E5094, FGRT0, Special Conditions III.5-6 and VI 9-10. A Violation Notice will be issued. There is no data for May 2024, because the data is no longer retrievable as noted above. June 2024 data indicates compliance. This missing data is a violation of MI-ROP-E5094-2024, Special Condition VI.16. A Violation Notice will be issued.

EUCOE1 is considered a PTE and was operating. According to the MAP, the air flow must be greater than 554 CFM. If that value is not achieved, the system is programmed to automatically shut down. Data was requested for air flow measurements for the time frame of July 2023-July 2024. 2023 data was reviewed, and a variety of deviations were noted, some of those were anticipated due to the information contained in the deviation report for that period. Hutchinson reported these as deviations of MI-ROP-E5094, FGRT0, Special Conditions III.5-6 and VI 9-10. A Violation Notice will be issued. There is no data for May 2024, because the data is no longer retrievable as noted above. This missing data is a violation of MI-ROP-E5094-2024, Special Condition VI.16. A Violation Notice will be issued. In addition to that, AQD identified 6 additional deviations in July 2024, which would be included in a future deviation report.

EUCOE2

At the time of the inspection, EUCOE02 was in place and operational, however it was not operating at the time I was there. EUCOE02 is identified during the permitting process as a PTE, however no data is being collected for this unit.

Based on the records provided, the emission unit began operation in July 2023, Hutchinson did not submit a minor modification until one was requested by the AQD and it was submitted on 2/21/2024. Despite multiple requests for a specific date, one was not provided by the facility, but rather they indicated that the records were started for the unit when the operation began.

AQD staff identified that Hutchinson has not been recording pressure drop of EUCE02 since it was installed in July 2023. This is a violation of MI-ROP-E5094-2024, Special Condition VI.16. A Violation Notice will be issued. Hutchinson reported these as deviations of MI-ROP-E5094, FGRT0, Special Conditions III.5-6 and VI 9-10. A Violation Notice will be issued.

The permit requires that within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204 shall notify the AQD District Supervisor, in writing, of the completion of the activity. This has not been done and as such is a violation of MI-ROP-E5094-2024, Special Condition VII.4. A Violation Notice will be issued.

Additionally, Hutchinson has not updated the existing MAP to include provisions for EUCE02, and as such this is a violation of MI-ROP-E5094-2024, FGRT0, Special Condition III.4. A Violation Notice will be issued.

FGMMMM

This flexible group consists of FGRT0 and associated coating booths subject to 40 CFR Part 63, Subpart MMMM (Subpart MMMM). It is considered an existing affected source and had an initial compliance date of January 2, 2007. The facility utilizes the emission rate with add-on controls option. The permit identifies an emission limit of 37.7 pounds (lbs) of organic HAP per gallon of coating solids. However, since Hutchinson is subject to both 40 CFR Part 63 Subpart MMMM and PPPP, they have chosen to comply with a facility-specific emission limit alternative of 2.74 lbs of organic HAP per lb of coating solids. This includes all metal and plastic parts coating application at the facility. The company reports that their emissions have been no greater than 0.77 lbs of organic HAP per lb of solids.

It is noted that FGMMMM, Special Condition I.3 contains language that includes a provision for exclusion during periods of startup, shutdown and malfunction. That language is incorrect and is no longer in Subpart MMMM. The current rule language states, in part, any coating operation(s) for which you use the compliant material option or the emission rate without add-on controls option, must be in compliance with the applicable emission limit in at all times. The correct permit language is contained in Special Condition I.4.

The facility is required to develop and implement a work practice plan to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners and other additives, and cleaning materials used in the controlled coating operations. During the inspection, AQD staff observed uncovered containers used to store coating materials and waste. While the facility did report this deviation under FGRT0, this is also a deviation of the work practice standards of Subpart MMMM, which was not reported. As such, this is a violation of FGMMMM, Special Condition III.1 and III.4, for failure to maintain the provisions of the work practice standards as

required. It is noted that Special Condition III.3 also contains language that includes a provision for exclusion during periods of startup, shutdown and malfunction. That language is incorrect and is no longer in Subpart MMMM.

The facility is required to monitor and record the RTO temperature and air flow of the paint booths subject to Subpart MMMM. The minimum combustion temperature established during stack testing is 1,475°F, and the direction of the air flow must be into the enclosure at all times and if a PTE 200 feet per minute or at least 0.007" H₂O or for a non-PTE the value established for that enclosure. At any time if those values are not achieved, the capture and control efficiency of the RTO is assumed to be zero when deviations of process operating parameter limits occur. Based on a review of the recordkeeping, Hutchinson did not correctly calculate emissions during times when the air flow into the enclosure did not achieve the required rate during the semi-annual reporting period of July – December 2023. As such this is a violation of MI-ROP-E5094-2024, FGMMMM, Special Condition VI.5 and 40 CFR 63.3961(h). A Violation Notice will be issued.

The facility is required to install, operate and maintain a Continuous Parameter Monitoring System (CPMS) for each coating emission unit. Under Subpart MMMM, the company is required to monitor the temperature of the RTO, pressure drop or face velocity of booths that are a PTE, and the volumetric flow rate for booths that are not PTE. Monitoring parameter values are to be established during performance testing. Through the CPMS the company is recording the RTO temperature, the air flow to the RTO, the air flow for each booth, and the pressure drop at 15-minute intervals. Due to the large data set of the CPMS, records were requested for the time period of July 2023-June 2024 and were provided including 3-hour block averages. Under 40 CFR Part 63.3968(a), air flow can be determined on a 3-hour block average basis for a PTE.

As previously noted, the facility is not recording emission capture system parameter data for EUCOE02 required by MI-ROP-E5094-2024, FGMMMM, Special Condition VI.7 and 40 CFR 63.3968(a). A Violation Notice will be issued. Since there is no data since the booth was installed in 2023, Hutchinson must consider capture and control to be zero.

Additionally, the records for May 2024 were not accessible as noted above. This is a violation of MI-ROP-E5094-2024, FGMMMM, Special Condition VI.3 and 40 CFR 63.3930. A Violation Notice will be issued.

Per Subpart MMMM, the facility is required to conduct CPMS accuracy audits every quarter and after every deviation. Accuracy audits were not conducted on the RTO temperature monitoring device or on the CPMS for the enclosures during the fourth quarter 2023, or the first and second quarters of 2024. This is a violation of MI-ROP-E5094-2024, FGMMMM, Special Condition IX.1 and 40 CFR 63.3968(c)(3)(iv). A Violation Notice will be issued.

40 CFR Part 63, Subpart PPPP

The facility is also subject to Subpart PPPP, but compliance is established through meeting the facility specific emission limit for Subpart MMMM as identified above.

FGDDDDD

The facility has two active natural gas-fired boilers. EUBOILER2 is a Wickes model, serial number 62127-1, that was manufactured and installed in 1956 and has a heat input capacity of 26.0 MMBtu/hr. This boiler is operated on a limited basis to provide backup to Boiler 4. EUBOILER4 is a Johnson model, serial number 823102, that was manufactured in 1985 and installed on January 22, 2018, which has a heat input capacity of 12.55 MMBtu/hr. Both boilers are subject to the requirements of 40 CFR Part 63, Subpart DDDDD. EUBOILER4 is not subject to NSPS for Industrial Steam Generating Units under 40 CFR Part 60, Subpart Dc because the unit was operating prior to the 1989 applicability date. Relocation or change in ownership does not affect the rule applicability to an "existing facility".

Both boilers require annual tune-ups. Boiler 4 was last tuned-up on October 24, 2023, and Boiler 2 on October 3, 2022, as it was not in use in 2023. These tune-ups included inspection, cleaning and maintenance in accordance with manufacturer specifications as well as carbon monoxide emission optimization through carbon monoxide concentration measurements and tuning. All reports were submitted in accordance with Subpart DDDDD and MI-ROP-E5094-2024.

FGRULE290

This flexible group includes EURUBBERMIX2, which includes dry mix compounding, a small rubber mixing, and milling process all controlled by a Torit baghouse (located outside the building). This emission unit has not been operational for years and will be removed from the facility in the future.

FGCOLDCLEANERS

One cold cleaner was observed during the inspection, and the lid was up. Hutchinson closed the lid immediately upon request as free liquid was observed.

EUGENERATOR

The facility has one small natural gas fired emergency generator that is exempt from Rule 201 permitting per Rule 285(2)(g). The generator is subject to NESHAP for Reciprocating Internal Combustion Engines under 40 CFR Part 63, Subparts A and ZZZZ. The generator is a 70-horsepower natural gas spark ignition (SI) reciprocating internal combustion engine (RICE) used for emergency purposes and was installed in May 2007. Due to the installation date, it is considered a new source. A new source is considered to be in compliance with the RICE NESHAP by complying with the New Source Performance Standard (NSPS) for Spark Ignition Internal Combustion Engines under 40 CFR Part 60, Subpart JJJJ. Only engines installed after June 12, 2006, and manufactured after January 1, 2009, are subject to the NSPS. Due to the manufacture date of the generator, there are no applicable requirements.

Plastic Injection and Rubber Injection

A Rule 278 demonstration will be requested for these new processes, not excluding any other new processes.

SUMMARY

Hutchinson Antivibration Systems Inc. was in non-compliance with provisions of MI-ROP-E5094-2018 and MI-ROP-E5094-2024 at the time of the inspection.

NAME April Lazzaro

DATE 09/30/2024

SUPERVISOR HH