



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 8, 2024

Jack Turner
Hutchinson Antivibration Systems, Inc.
460 Fuller Avenue NE
Grand Rapids, Michigan 49503

SRN: E5094, Kent County

Dear Jack Turner:

VIOLATION NOTICE

On August, 20, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Hutchinson Antivibration Systems, Inc. (Hutchinson) located at 460 Fuller Avenue NE, Grand Rapids, Michigan. The purpose of this inspection was to determine Hutchinson'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 Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-E5094-2024.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Carbon black transport system with baghouse	MI-ROP-E5094-2024, EUCARBON, Special Condition VI.1	Failure to document quarterly maintenance checks.
Four rubber mills and one mixer with baghouse	MI-ROP-E5094-2024, EUMIX, Special Condition VI.1	Failure to document quarterly maintenance checks.
Wheelabrator tumblast with baghouse	MI-ROP-E5094-2024, EUWHEEL, Special Condition VI.1	Failure to document quarterly maintenance checks.
Chain-on-edge coating booth number 2 (FGRT0)	MI-ROP-E5094-2024, FGRT0, Special Condition III.4	Failure to implement an acceptable Malfunction Abatement Plan (MAP) to include EUCOE02.
Chain-on-edge coating booth number 2 (FGRT0)	MI-ROP-E5094-2024, FGRT0, Special Condition V.2	Failure to conduct VOC control efficiency (stack test) within 180 days of startup of EUCOE02.

Process Description	Rule/Permit Condition Violated	Comments
FGRTO	MI-ROP-E5094-2018, FGRTO, Special Condition V.2	Failure to conduct VOC control efficiency (stack test) within 5 years of the most recent test.
Five coating lines (FGRTO)	MI-ROP-E5094-2024, FGRTO, Special Condition V.3	Failure to verify operational integrity of interlock system every two years.
Five coating lines (FGRTO)	MI-ROP-E5094-2024, FGRTO, Special Conditions III.5-6 & VI 9-10	Failure to operate emission units with capture system flow rate within required parameters.
Five coating lines (FGRTO)	MI-ROP-E5094-2024, FGRTO, Special Condition VI.16	Failure to maintain records of monitoring data.
EUCOE02 (FGRTO)	MI-ROP-E5094-2024, FGRTO, Special Condition VII.4	Failure to notify AQD of the completion of installation of EUCOE02.
Five coating lines (FGMMMM)	MI-ROP-E5094-2024, FGMMMM, Special Condition No. III.1 and III.4 and 40 CFR 63.3893	Deviation of work practice standards for failure to implement plan and open containers of organic HAP containing materials.
Five coating lines (FGMMMM)	MI-ROP-E5094-2024, FGMMMM, Special Condition VI.5 and 40 CFR 63.3961(h)	Failure to properly calculate emissions when deviations of process operating parameter limits occur.
EUCOE02 (FGMMMM)	MI-ROP-E5094-2024, FGMMMM, Special Condition VI.7 and 40 CFR 63.3968(a)	Failure to collect emission capture system parameter data.
Five coating lines (FGMMMM)	MI-ROP-E5094-2024, FGMMMM, Special Condition VI.3 and 40 CFR 63.3930	Failure to maintain capture system records.
Five coating lines (FGMMMM)	MI-ROP-E5094-2024, FGMMMM, Special Condition IX.1 and 40 CFR 63.3968(c)(3)(iv)	Failure to conduct CPMS accuracy audits for RTO or capture system for 3 quarters as required.

During the inspection and records review, AQD staff learned that Hutchinson could not provide documentation that the quarterly maintenance checks had been conducted on EUCARBON, EUWHEEL, and EUMIX, as required by the MAP. Hutchinson failed to incorporate EUCOE02 into the existing MAP.

Hutchinson failed to conduct stack testing on EUCOE02 within 180 days of the completion of installation of EUCOE02 and failed to conduct stack testing on FGRT0 within five years of the most recent test. Additionally, Hutchinson failed to verify the operational integrity of the interlock system within the last two years. Hutchinson also failed to notify the AQD of the completion of installation of EUCOE02.

In both FGRT0 and FGMMMM, the permit requires Hutchinson to collect monitoring data from the capture systems. There were instances where the flow rate was outside of compliant ranges, and the data was not maintained during May 2024 for EUSIL01, EUSIL02, EUSIL03, EUCOE01, and EUCOE02. Additionally, for EUCOE02, Hutchinson has not been collecting or maintaining monitoring data since it was installed in July 2023.

Hutchinson also failed to comply with the provisions of 40 CFR Part 63, Subpart MMMM. Notably, while the issue related to open containers observed during the inspection was included in the deviation report under FGRT0, it was not included in the semiannual compliance report as a deviation of the work practice standards under Subpart MMMM.

Hutchinson did not appear to properly calculate emissions during the second half of 2023, for purposes of Subpart MMMM and apply zero control efficiency during times where the monitoring data showed exceedances from the flow rates as required. An updated report with accurate emission rates should be submitted.

A Rule 278 exemption demonstration is requested for all new emission units at the facility, including but not limited to the plastic injection cells and the rubber injection cell, as certain processes and process equipment may be exempt from obtaining a Permit to Install (PTI). Rule 278 establishes requirements of eligibility for exemptions listed in Rules 280 through 291. To be eligible for a listed exemption, the owner or operator of an exempt process or exempt process equipment must be able to provide information demonstrating the applicability of the exemption. Pursuant to Rule 278(a), this demonstration should be provided within 30 days of a written request by the AQD and should include the following information:

- The specific exemption being used by the process or process equipment.
- An analysis demonstrating that Rule 278 does not apply to the process or process equipment.

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Pursuant to Rule 911, the AQD requests that Hutchinson submit an updated MAP for EUCOE02, EUCARBON, EUMIX, and EUWHEEL, to include appropriate ranges for the baghouse pressure drop for each emission unit. Please submit the updated MAP by November 22, 2024 (which coincides with 45 calendar days from the date of this letter).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 29, 2024 (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.

Please submit the written response to April Lazzaro at EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 or LazzaroA1@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Hutchinson 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. 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
616-558-1092

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE