



HAV-17-051-LTR

December 14, 2017



Ms. Kaitlyn DeVries  
Air Quality Division  
State Office Building, 5<sup>th</sup> Floor  
350 Ottawa Ave. NW, Unit 10  
Grand Rapids, MI 49503

Dear Ms. DeVries,

This letter is in response to the violation notice dated December 7, 2017 regarding a Rule 201 violation. The information that was requested in the letter is outlined below.

**Dates the Violation Occurred:** The violation occurred November 15, 2017.

**Explanation of the Causes:** On November 15, H005940 ICS 459 was processed in one of the West powder mixers (FG-WESTPOWDER, SV-7). It is a product that was not evaluated during our permit application. Due to ICS 459 being a rush order, the standard operating procedure to check the scheduled production beforehand to ensure it complies with permit limits was not followed as a result of human error. The check would have flagged the discrepancy. This was discovered the following week during the weekly environmental recordkeeping check. Due to Thanksgiving break, the details of the incident were confirmed on November 27. A meaningful increase evaluation was completed for sodium percarbonate which was the only compound at a pound per hour concentration greater than submitted in the permit application. The calculation was over a 10% increase. The violation was disclosed to Kaitlyn DeVries on November 27 over the phone, and later on November 28 through email.

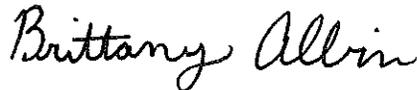
**Duration of Violation:** H005940 ICS 459 took approximately 30-45 minutes to blend and package out of the mixer.

**Whether the Violation is Ongoing:** No, the violation is not ongoing. The violation only occurred when ICS 459 was being processed.

**Summary of the Actions that have been Taken and are Proposed to be Taken to Correct the Violation; What Steps are being Taken to Prevent a Reoccurrence:** The importance for following the standard operating procedure for checking the production schedule was reviewed again and the importance stressed with the Scheduler, Facility Supervisor, and Operations Manager. A permit modification updating the pph of sodium percarbonate in the application material will be submitted.

The safety data sheet for ICS 459 is enclosed. If you have any questions, please call or email me at (616) 365-3654 or [brittanya@havalandusa.com](mailto:brittanya@havalandusa.com).

Sincerely,



Brittany Albin  
Environmental Engineer

Enclosures:  
SDS ICS 459