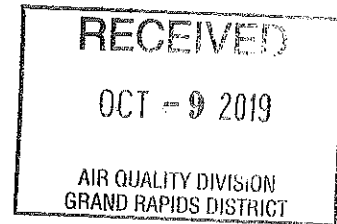




HAV-19-045-LTR

October 7, 2019

EGLE-AQD
Grand Rapids District
350 Ottawa Avenue NW Unit 10
Grand Rapids, MI 49503



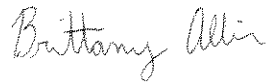
Dear Ms. DeVries,

This letter is in response to the violation notice dated September 19, 2019. To recap, FGWESTPOWDER was sited with a Rule 910 violation for failure to properly operate a pollution control device. FGWESTPOWDER is currently under consent order AQD 2018-1. A written response was requested to be submitted by October 10, 2019 regarding the cited violation. The following details the violation and corrective actions:

- FGWESTPOWDER, Powder Blending Wet Scrubber, SV-7 – Rule 290, PTI No. 71-17E SC IV.1 violation
 - **Dates the violation occurred:** August 14, 2019
 - **Explanation of cause and duration of violations:** The emission of particulates to the roof was caused by three of the four spray nozzles on the outlet of the scrubber bed being plugged. This was discovered on August 23, 2019 when the scrubber was inspected. The nozzles were last inspected June 14, 2019 and were clear at that time.
 - **Are the violations ongoing:** The violations are not ongoing. Photos from Friday, September 6 to Wednesday, September 25, included with this letter, show the West Manufacturing roof has been clear of particulate.
 - **Corrective action that has taken place or proposed and dates these actions will occur:** On August 23, 2019, when the West Powder Blending Scrubber was inspected the nozzles were cleared.
 - **Steps being taken to prevent a reoccurrence:** Screens will be installed upstream of the scrubber to prevent debris from plugging the nozzles. This will take place by Friday, December 6, 2019.

If you have any questions, please contact me at (616) 365-3654 or brittanya@havilandusa.com.

Sincerely,

A handwritten signature in cursive script that reads "Brittany Albin".

Brittany Albin
Environmental Engineer

Attachments: 1 – Photos of West Powder Blending Scrubber Exhaust, SV-7

Cc: Ms. Jenine Camilleri, Enforcement Unit Supervisor
EGLE-AQD
P.O. Box 30260
Lansing, MI 48909-7760