

Miles ✓



Florist Tower, 5757 N. Green Bay Avenue
Milwaukee, WI 53209

September 29, 2020

Via Certified Mail

Mr. Cody Yazzie, Environmental Engineer, Air Quality Division, EGLE
7953 Adobe Road,
Kalamazoo, Michigan 49009



RE: **Violation Notice P0194_VN_20200910**
Dated September 10, 2020
Clarios APS Production, LLC
70 West 48th Street
Holland, Michigan 49423

Dear Mr. Yazzie:

Clarios, LLC. is submitting this letter with our responses to Violation Notice P0194_VN_20200910 which we received on September 11, 2020.

Clarios would like to thank Cody Yazzie for his time spent before, during and after his visit to our Meadowbrook facility. In spite of these trying times flexing between work at home and the office Cody was able to complete a thorough inspection of our air permitting requirements.

Before responding, Clarios would like to identify a discrepancy in the report regarding the date we were first notified. On page 1 of the Activity Report under the Records Review Conducted (July 16, 2020) section it is stated that on **April 24, 2020** the Air Quality Division sent an email to Shellie Ritsema. A search of our records did not locate an email on or around **April 24, 2020** from **Cody Yazzie**, however we were able to confirm receipt of an email from **Cody Yazzie** on **July 16th, 2020**.

At the end of 2016 the Meadowbrook facility largely idled the regular production of cylindrical lithium ion cells. Production ran for 33 days in 2016, 15 days in 2017, 20 days in 2018, 7 days in 2019, and 7 days so far in 2020. In total, the permitted process operated <4.5% of the time over the past 5 years. As a result of our intermittent production activities, the data collection processes originally established to support a continuous manufacturing process were unable to maintain data in a readily retrievable manner. The response to the 4 findings below will demonstrate changes to our system to ensure the data is captured and maintained in a readily retrievable manner going forward

Clarios would like to address the four observations listed in the Violation Notice in a prompt and expeditious manner. As requested, this following details our response and subsequent actions to these observations:

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- FGDRYMATERIALS/Special Condition VI.2: Facility was not maintaining record of Daily Pressure Drop Reading across dust collector

Clarios Response: The facility is taking manual readings and logging the daily pressure drops during the current coating run. As of 9/8/20, we have created instructions for the purpose of training, performing checks and collecting data on a regular basis. The instructions are cross-referenced in start-up instructions for the Powder Convey processes to ensure this requirement is not missed even in the event of a personnel change. Currently data is collected on a hard copy log that is built into the instructions. Long term, both hard copy and electronic copies of daily pressure drop readings will be stored. In addition, a calendar tab has been added to the MAERS reporting workbook to track actual production days and to document no production on days and weeks that the equipment is idle.

- FGDRYMATERIALS/Special Condition VI.3: Facility was not maintaining record of visible emissions readings once per calendar month that unit is operated.

Clarios Response: As of 9/8/20, we have created instructions using the EPA Method 22 – Visual Determination for Fugitive Emissions as a guideline. Currently 2 individuals have been trained to complete visible emissions using the instruction and log as a guide. The instructions are cross-referenced in start-up instructions for the Powder Convey processes to ensure this requirement is not missed even in the event of a personnel change. During the last process run, 9/8/20 – 9/17/20, we performed and tracked visible emissions readings for each type of powder.

- EUPILOT/Rule 336.1201(3): Not maintaining records of RTO for a period of five years. Staff requested records of RTO combustion temperature for 2019 that the facility was unable to produce.

Clarios Response: The facility has updated the existing RTO Start-up /Shut-down instructions to include steps to pull data after every run and hand off to the Environmental supervisor for tracking and filing. Tags have been added to the HMI which send data automatically to a database. Data will be collected for days/months during which the RTO is running. This data is capable of being presented in a line chart format that indicates the temperature during a coating run. The controls team has been performing test runs of the RTO to ensure that the HMI readout and the software data match. A monthly task has been created in the EHS Compliance Calendar as a double check to confirm data has been pulled each month as necessary.

- EUCOATING/Special Condition VI.2: Facility did not have record of both the scrubber make-up water flow rate and recirculation water flow rate of the EUCOATING scrubber on a calendar day basis, when the scrubber is in operation.

Clarios Response: The Facility is logging the scrubber make-up water flow rate and the recirculation water flow rate manually during the current coating run. As of 9/8/20, we have created instructions with a built in log for collecting this data on a regular basis. This instruction includes the formula for calculating scrubber efficiency and confirming that 95% or greater is being achieved. The instructions are cross-referenced in start-up instructions for the Powder Convey processes to ensure this requirement is not missed even in the event of a personnel change. Currently data is collected on a hard copy log that is built into the instructions. Long term, both hard copy and electronic copies of scrubber make-up water flow rate and the recirculation water flow rate readings will be stored. In addition, a calendar tab has been added to the MAERS reporting workbook to track actual production days and to document no production on days and weeks that the equipment is idle.

In addition to the actions above, we have added a Production Calendar Tab to our Air Emissions Tracking workbook in order to capture production time vs no production days/months. This should allow for more streamlined data reviews in the future.

We hope this letter adequately provides the information requested by your office. Please do not hesitate to contact the undersigned or Shellie Ritsema should you have any questions or need additional information/clarification related to this Violation Notice.

Sincerely,



Shelly Maciejewski
Plant Manager

Attachments

- A: Copy of Violation Notice P0194_VN_20200910 dated September 10, 2020
- B: Compliance Plan

EGLE, ADQ
Kalamazoo District
7953 Adobe Road
Kalamazoo, MI 49009

Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
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