

8/10/2015

Sent via email (8/10/2015)

Mr. Erik A. Gurshaw
Environmental Quality Analyst
Michigan Department of Environmental Quality
Air Quality Division
(586) 753-3743

Re: Violation Notice
H.R. Technologies, 32500 North Avis Drive, Madison Heights, Michigan 48071

Dear Mr. Gurshaw,

BB&E, Inc. has prepared this letter on behalf of H.R. Technologies, Inc. (HRT) located at 32500 North Avis Drive in Madison Heights, Michigan, in response to the July 1, 2015 Violation Notice from the Michigan Department of Environmental Quality (MDEQ). This letter addresses the comments presented in the MDEQ Violation Notice. Each comment is addressed specifically below. Supporting information can be located in the attachments referenced in this letter.

DEQ Comment 1 - Special Conditions II.1 and VI.3.b of PTI #115-12

DEQ Comments: Company is not maintaining 12-month rolling records of the amount of material processed in EUAUTOCLAVE 1.

Response: EUAUTOCLAVE 1 is the standby autoclave. It is non-operational the majority of the time. HRT maintains records of material usage at the facility; however, the vast majority is used in EUAUTOCLAVE 2. In the near term, HRT will track materials processed separately, but will consider working with the MDEQ to modify its current air permit to reflect recordkeeping requirements that are customary with HRT's operations. The tracking spreadsheet with rolling annual totals is attached.

DEQ Comment 2 - Special Conditions II.2 and VI.3.b of PTI #115-12

DEQ Comments: Company is not maintaining 12-month rolling records of the amount of material processed in EUAUTOCLAVE 2.

Response: HRT maintains records of material usage at the facility with the vast majority of material being used at EUAUTOCLAVE 2. In the near term, HRT will track materials processed separately, but will consider working with the MDEQ to modify its current air permit to reflect recordkeeping requirements that are customary with HRT's operations. The tracking spreadsheet with rolling annual totals is attached.

DEQ Comment 3 - Special Condition VI.3.a of PTI #115-12

DEQ Comments: Company is not maintaining monthly records of the amount of material processed in each autoclave.



HRT Response: EUAUTOCLAVE 1 is the standby autoclave. It is non-operational the majority of the time. HRT maintains records of material usage at the facility with the vast majority being used at EUAUTOCLAVE 2. In the near term, HRT will track materials processed separately, but will consider working with the MDEQ to modify its current air permit to reflect recordkeeping requirements that are customary with HRT's operations. The attached tracking spreadsheet shows the monthly usage for each autoclave.

DEQ Comment 4 - Special Condition VI.3.c of PTI #115-12

DEQ Comments: Company is not calculating monthly formaldehyde emissions in pounds per month and pounds per 12-month rolling time period for each autoclave.

Response: HRT maintains records of material usage at the facility. The formaldehyde emission factors developed during the Permit to Install (PTI) process are a function of material usage. In the near term, HRT will track emissions from materials processed separately, but will consider working with the MDEQ to modify its current air permit to reflect recordkeeping requirements that are customary with HRT's operations. The attached tracking spreadsheet shows the rolling annual formaldehyde emissions.

DEQ Comment 5 - Special Condition VI.3.d of PTI #115-12

DEQ Comments: Company is not calculating monthly and 12-month rolling VOC emissions from the autoclaves combined.

Response: EUAUTOCLAVE 1 is the standby autoclave. It is non-operational the majority of the time. HRT maintains records of material usage at the facility; with the vast majority being used at EUAUTOCLAVE 2. The VOC emission factors developed during the PTI process are a function of material usage. In the near term, HRT will track emissions from materials processed separately, but will consider working with the MDEQ to modify its current air permit to reflect recordkeeping requirements that are usual and customary with HRT operations. The tracking spreadsheet with rolling annual VOC emissions is attached.

DEQ Comment 6 - Rule 201

DEQ Comments: Company installed and operated a laminate foaming process line which uses a binder containing 1% to 5% methylenebis (phenylisocyanate). Methylenebis (phenylisocyanate) is a Hazardous Air Pollutant.

Response: Methylene diisocyanates (MDI) in adhesives, such as the PURMELT QR-6205, a polyurethane adhesive, used on the laminator at HRT, emit low levels of MDI. See attached Safety Data Sheet (SDS) for PURMELT QR-6205. Using the American Chemistry Council's MDI Emissions Calculators, the potential to emit for MDI is 31 pounds per year (2.6 pounds per month). Please see the attached spreadsheet for laminator calculations. MDI has an Initial Threshold Screening Level (ITSL) of 0.6 ug/m³; therefore, it appears to meet the Rule 290 exemption for compounds that have an ITSL between 0.04 and 2.0 ug/m³. HRT will complete the required Rule 290 recordkeeping for this material to demonstrate compliance. HRT will evaluate its material inventory for other potential materials that may require permitting. If air permitting is required based on a review of materials, a PTI modification will be prepared for MDEQ review.

BB&E, Inc. and HRT are pleased to have the opportunity to offer this response to the MDEQ's Violation Notice. Additionally, we would welcome the opportunity to meet with DEQ personnel to discuss the identified violations and work through potential solutions. Should you have any questions regarding this response, please do not hesitate to contact me at (248) 489-9636, ext. 309.

Sincerely,



BB&E, Inc.

James D. Colmer, P.E.

Project Manager

Cc: Jayant Patel, H.R. Technologies

Attachments:

Attachment 1 – H.R. Technologies Emissions Calculations

Attachment 2 – H.R. Technologies Laminator Calculations

Attachment 3 – Safety Data Sheet – PURMELT QR-6205