



STATE OF MICHIGAN  
 DEPARTMENT OF ENVIRONMENTAL QUALITY  
 SOUTHEAST MICHIGAN DISTRICT OFFICE



RICK SNYDER  
 GOVERNOR

DAN WYANT  
 DIRECTOR

July 1, 2015

Mr. Jayant M. Patel  
 H.R. Technologies, Inc.  
 32500 North Avis Drive  
 Madison Heights, Michigan 48071

SRN: P0367, Oakland County

Dear Mr. Patel:

**VIOLATION NOTICE**

On June 17, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of H.R. Technologies, Inc. located at 32500 North Avis Drive in Madison Heights, Michigan. The purpose of this inspection was to determine H.R. Technologies, Inc.'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 administrative rules and the conditions of Permit to Install (PTI) number 115-12.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Muffler Mold Autoclaving (EUAUTOCLAVE1)	Special Conditions II.1 and VI.3.b of PTI #115-12	Company is not maintaining 12-month rolling records of the amount of material processed in EUAUTOCLAVE1.
Muffler Mold Autoclaving (EUAUTOCLAVE2)	Special Conditions II.2 and VI.3.b of PTI #115-12	Company is not maintaining 12-month rolling records of the amount of material processed in EUAUTOCLAVE2.
Muffler Mold Autoclaving (EUAUTOCLAVE1 and EUAUTOCLAVE2)	Special Condition VI.3.a of PTI #115-12	Company is not maintaining monthly records of the amount of material processed in each autoclave.

Muffler Mold Autoclaving (EUAUTOCLAVE1 and EUAUTOCLAVE2)	Special Condition VI.3.c of PTI #115-12	Company is not calculating monthly formaldehyde emissions in pounds per month and pounds per 12-month rolling time period for each autoclave.
Muffler Mold Autoclaving (FGAUTOCLAVES)	Special Condition VI.3.d of PTI #115-12	Company is not calculating monthly and 12-month rolling VOC emissions from the autoclaves combined.
Laminate Foaming	Rule 201	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.

During this inspection, H.R. Technologies, Inc. was unable to produce formaldehyde and VOC emission records from FGAUTOCLAVES and material processing records for EUAUTOCLAVE1 and EUAUTOCLAVE2.

This is a violation of the recordkeeping requirements specified in Special Condition numbers II.1, II.2, VI.3.a, VI.3.b, VI.3.c, and VI.3.d of PTI number 115-12.

These conditions of PTI number 115-12 require monthly and 12-month rolling formaldehyde emission calculations for each autoclave, monthly and 12-month rolling VOC emissions calculations for the autoclaves combined, and monthly and 12-month rolling material processing records for each autoclave.

Enclosed is a copy of the above referenced PTI.

During this inspection, it was also noted that H.R. Technologies had installed and commenced operation of a laminate foaming line which uses a binder containing a Hazardous Air Pollutant (methylenebis) at the facility. The AQD staff advised H.R. Technologies, Inc. on June 30, 2015, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the laminate foaming process equipment. An application form is available by request, or at the following website:

[http://www.deq.state.mi.us/aps/nsr\\_information.shtml](http://www.deq.state.mi.us/aps/nsr_information.shtml)

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 22, 2015 (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.

If H.R. Technologies, Inc. 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 H.R. Technologies, Inc. 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,



Erik A. Gurshaw  
Environmental Quality Analyst  
Air Quality Division  
586-753-3743

EAG/DAC

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Christopher Ethridge, DEQ