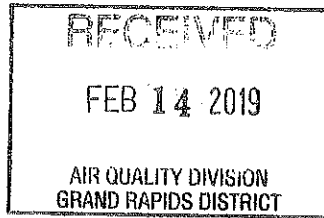




Mr. Tyler Salamasick
DEQ, AQD, Grand Rapids District
350 Ottawa Avenue NW
Unit 10
Grand Rapids MI, 49503



February 11, 2019

Hello Tyler,

Please receive this communication as our response to the 2nd Violation Notice (VN) sent by your office dated January 23, 2019, regarding odors attributed to Innotec operations at 233 W. Washington Ave in Zeeland MI.

First I'd like to apologize that this response will be issued to you later than the due date indicated in the violation which was February 6 2019. For reasons I do not yet understand, the notice was not received by me until late in the afternoon on February 8, 2019. There were weather events occurring between the date of issue and our receipt that could have affected delivery so whatever that was is conjecture at this point so please accept our apology.

To begin addressing this 2nd VN we should update what has been done since our prior response. In that reply, there were numerous planned items listed that we have since completed, they are:

-Expert visit by Lillian Wooley, a representative of Fishbeck, Thompson, Carr & Huber, Inc., observed the drying system and exhaust.

-Expert visit by Mike Beck, P.E. Technical Director at ERM here in Holland MI came to see the process as well.

****Combined experts summary recommendations:** apply a dilution strategy using a venturi stack, investigate better filtration other than cartridge style, improve collection hood, look at activated carbon, thermal oxidizers, packed bed scrubbers and odor neutralizing or masking systems.

-We completed the installation of a new designed hood for the mill scale dryer. Design was already in process at the time of the experts visit but in concurrence with the recommendations they made. We are generally happy with the results but there are a couple tweaks we will be doing to make it better.

- We redesigned and installed a venturi stack to aid blending of ambient air with the exhaust of the mill scale dryer. Again the two experts listed above and the many who visited prior made mention this would help towards reducing odor. The result was not as pronounced as we would have liked and DEQ

confirmed our findings later as well. In order to improve will require blending much more ambient air than our current blower can produce and the filtration can handle.

Essentially everything we said we were going to do in our reply has been done, unfortunately not to a level acceptable.

Next steps:

-We continue to consider masking or neutralizing agents. You have said your office hasn't seen the most positive results using these materials but given this 2nd VN we will give it more consideration. If it works it could be a good interim corrective action as far as our neighbors are concerned.

-We were looking for companies who take samples and can analyze our exhaust for loadings and particle size distribution. We found a lab that is capable to perform test as needed. This information will be very helpful in our approach for choosing the appropriate control technologies combined to better filtrate and remove odor. We located a source for the testing equipment and expect quotes this week. Provided the items are in stock and the lab has available capacity, we could have initial sampling results by the end of next week 2/22.

-There are a half dozen or more projects and experiments we will attempt in the coming weeks that may or may not improve on the odor situation. The most important though is the upcoming particle distribution tests as the data will be useful for the equipment vendor's solution options.

Once we have sufficient particle data we'll make a determination, probably some type of wet collection or combination scrubber system followed by a HEPA. We understand smoke lives between .3 and 1 micron and HEPA is 99.97 % efficient in that zone so if we can get to that level we will be a long ways better than our cartridge collector capabilities and improved odor.

Lastly, In the VN you are asking for exemption demonstrations per rule 278(a) on the mill scale dryer and the plastic extrusion line. To provide this information will take a lot of time searching our data base as it was before my tenure those units were installed. Given that, I would like to ask for additional grace in extended timing, hoping we can work with you to understand better and provide the information you are asking for?

I realize that all of this activity has taken time, more than you would have liked and we too for that matter so thanks again for your help and patience.

Best regards,

Tom VanderHenst
Innotec Group
616-990-5911



Cc:

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

Mario Veldhuijzen
Innotec Group