



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

March 10, 2017

Mr. Eric Jamet
Hutchinson Antivibration Systems, Inc.
460 Fuller Avenue, NE
Grand Rapids, Michigan 49503

SRN: E5094, Kent County

Dear Mr. Jamet:

VIOLATION NOTICE

On February 16, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Hutchinson Antivibration Systems, Inc. located at 460 Fuller Avenue, NE, Grand Rapids, Michigan. The purpose of this inspection was to determine Hutchinson Antivibration Systems, 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 Air Pollution Control Rules; the conditions of Renewable Operating Permit (ROP) number MI-ROP-E5094-2012c and Consent Order AQD No. 25-2016.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Rubber mixing line with associated baghouse (EUMIX)	ROP No. MI-ROP-E5094-2012c, General Condition No. 9 Rule 370	Carbon black particulate was not properly contained which resulted in large amounts of fine carbon black dust coating the ground and baghouse equipment.
Rubber mixing line with associated baghouse (EUMIX)	ROP No. MI-ROP-E5094-2012c, EUMIX, Special Condition (SC) VI.2	For four weeks during January 2016 through December 2016, non-certified visible emission readings were not conducted in accordance with the permit.
Rubber mixing line with associated baghouse (EUMIX)	ROP No. MI-ROP-E5094-2012c, EUMIX, SC IX.1	A preventative maintenance plan is not available.
Carbon black storage system with associated fabric filters (EUCARBON)	ROP No. MI-ROP-E5094-2012c, EUCARBON, SC IX.1	A preventative maintenance plan is not available.
Wheelabrator shot blast machine (EUWHEEL)	ROP No. MI-ROP-E5094-2012c, EUWHEEL, SC IX.1	A preventative maintenance plan is not available.

Process Description	Rule/Permit Condition Violated	Comments
Rubber-to-metal surface coating operations (FGRTO)	ROP No. MI-ROP-E5094-2012c, FGRTO, SC III.3 Consent Order AQD No. 25-2016, Paragraph 9.A	Fugitive emissions were not minimized. Fugitive emissions were noted coming from paint pots at EUSIL01, EUSIL02, EUCOE01. In addition, the coating line area had a significant solvent odor.
Rubber-to-metal surface coating operations (FGRTO)	ROP No. MI-ROP-E5094-2012c, FGRTO, SC III.4.b Consent Order AQD No. 25-2016, Paragraph 9.A	The company has a malfunction abatement plan (MAP) but did not update the process operating variables in the plan necessary to achieve compliance with applicable emission limits.
Rubber-to-metal surface coating operations (FGRTO)	ROP No. MI-ROP-E5094-2012c, FGRTO, SC III.4.c Consent Order AQD No. 25-2016, Paragraph 9.A	The company has a malfunction abatement plan (MAP) but did not implement actions to alarms or implement shutdown procedures as identified in the plan.
Rubber-to-metal surface coating operations (FGMMMM)	ROP No. MI-ROP-E5094-2012c, FGMMMM, SC III.1.a and VI.4. 40 CFR 63.3892(b) and 40 CFR 63.3967(a) Consent Order AQD No. 25-2016, Paragraph 9.B	From July 2016 through February 2017, there were approximately 229, 3-hour block averages of the RTO temperature that were below the minimum operating temperature of 1,577°F established during the July 2016 performance test.
Rubber-to-metal surface coating operations (FGMMMM)	ROP No. MI-ROP-E5094-2012c, FGMMMM, SC III.1.b and VI.4. 40 CFR 63.3892(b) Consent Order AQD No. 25-2016, Paragraph 9.B	For EUCOE01, from July 2016 through February 2017, there were at least 103, 3-hour block averages of the pressure drop across the enclosure that were below the minimum pressure drop of 0.007 inches of water.

Process Description	Rule/Permit Condition Violated	Comments
Rubber-to-metal surface coating operations (FGMMMM)	ROP No. MI-ROP-E5094-2012c, FGMMMM, SC III.1.b and VI.4. 40 CFR 63.3892(b) Consent Order AQD No. 25-2016, Paragraph 9.B	For EUSIL02, from July 2016 through February 2017, there were at least 890, 3-hour block averages of the pressure drop across the enclosure that were below the minimum pressure drop of 0.007 inches of water.
Rubber-to-metal surface coating operations (FGMMMM)	ROP No. MI-ROP-E5094-2012c, FGMMMM, SC III.1.b and VI.4. 40 CFR 63.3892(b) Consent Order AQD No. 25-2016, Paragraph 9.B	For EUSIL03, from July 2016 through February 2017, there were at least 46, 3-hour block averages of the pressure drop across the enclosure that were below the minimum pressure drop of 0.007 inches of water.
Rubber-to-metal surface coating operations (FGMMMM)	ROP No. MI-ROP-E5094-2012c, FGMMMM, SC III.1.b and VI.4. 40 CFR 63.3892(b) Consent Order AQD No. 25-2016, Paragraph 9.B	For EUSIL04, from July 2016 through February 2017, there were at least 203, 3-hour block averages of the pressure drop across the enclosure that were below the minimum pressure drop of 0.007 inches of water.
Rubber-to-metal surface coating operations (FGMMMM)	ROP No. MI-ROP-E5094-2012c, FGMMMM, SC III.1.a and VI.4. 40 CFR 63.3892(b) and 40 CFR 63.3967(f) Consent Order AQD No. 25-2016, Paragraph 9.B	For EUSIL01 from July 2016 through February 2017 there were approximately 1,194, 3-hour block averages of the volumetric flow rate that were below the minimum operating flow rate of 2,369 cubic feet per minute established during the July 2016 performance test.
Rubber-to-metal surface coating operations (FGMMMM)	ROP No. MI-ROP-E5094-2012c, FGMMMM, SC III.2 and III.5 40 CFR 63.3893(b) Consent Order AQD No. 25-2016, Paragraph 9.B	Organic HAP emissions were not minimized. Fugitive emissions were noted coming from paint pots at EUSIL01, EUSIL02, EUCOE01. In addition, the coating area had a significant solvent odor.

Process Description	Rule/Permit Condition Violated	Comments
Rubber-to-metal surface coating operations (FGMMMM)	ROP No. MI-ROP-E5094-2012c, FGMMMM, SC VII.7 40 CFR 63.3968(c)(3)(iv) Consent Order AQD No. 25-2016, Paragraph 9.B	An accuracy audit of the temperature monitoring device was not conducted after every deviation in accordance with the standard.
Rubber-to-metal surface coating operations (FGMMMM)	ROP No. MI-ROP-E5094-2012c, FGMMMM, SC VII.7 40 CFR 63.3968(g)(1)(v) Consent Order AQD No. 25-2016, Paragraph 9.B	An accuracy audit of the flow monitoring device was not conducted after every deviation in accordance with the standard.
Rubber-to-metal surface coating operations (FGMMMM)	ROP No. MI-ROP-E5094-2012c, FGMMMM, SC VII.7 40 CFR 63.3968(g)(2)(v) Consent Order AQD No. 25-2016, Paragraph 9.B	An accuracy audit of the pressure drop monitoring device was not conducted after every deviation in accordance with the standard.
Rubber-to-plastic surface coating operations	40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products	Failure to comply with applicable requirements of 40 CFR Part 63, Subpart PPPP

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 31, 2017 (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 recurrence.

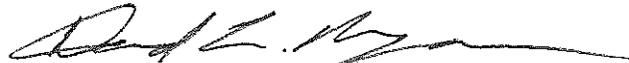
Please note that 40 CFR 63.3963(c) states that the facility must demonstrate continuous compliance with each operating limit as specified in Table 1 of the rule. In addition, 40 CFR 63.3963(c)(2) states, if an operating parameter deviates from the operating limit specified in Table 1 to the subpart, then the company must assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation, unless the company has other data indicating the actual efficiency of the emission capture system and add-on control device and the use of these data is approved. Therefore, as part of your response to this letter, Hutchinson Antivibration Systems, Inc. will have to recalculate Hazardous Air Pollutant emissions using zero efficiency for those times when operating parameters deviated from the applicable limit and submit these calculations to the Air Quality Division.

Mr. Eric Jamet
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If Hutchinson Antivibration Systems, 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 Hutchinson Antivibration Systems, 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,



David L. Morgan
Environmental Quality Specialist
Air Quality Division
616-356-0009

cc: Ms. Heidi Hollenbach, DEQ
cc/via email: Mr. Jim Niesen, Hutchinson Antivibrations Systems Inc.
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ