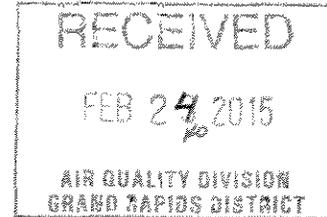


February 19, 2015

Ms. April Lazzaro
MDEQ-Grand Rapids District Office
350 Ottawa Avenue, NW, Unit 10
Grand Rapids, MI 49503-2341



Re: Response to Request for additional information
Hutchinson Antibration Systems, Inc. (SRN No. E5094)
Grand Rapids, Michigan

Dear Ms. Lazzaro:

Following is our response to your February 6, 2015 email. I have put what I believe are the specific items you would like responded to below in bold lettering followed by our response to each item.

The Violation Notice response states that Hutchinson submitted a SSM Plan in August of 2012 and no changes have been made to the process that requires updating the plan since then. Please note that the chain-on-edge N and S individual coating operations were issued a Permit to Install on August 26, 2013.

Installing the new COE did not necessitate an update to the SSM plan. Because the affected source under Subpart Mmmm is the entire facility and not individual emission units, installation of new equipment does not require an update to the plan. The SSM plan covers all equipment connected to the RTO and does not list requirements for individual emission units.

To date, Hutchinson has not conducted the necessary evaluations on this equipment pursuant to the requirements in MI-ROP-E5094-2012b, FGMMMM. 40 CFR 63.3900 states that, "If your affected source uses an emission capture system and add-on control device, you must develop a written startup, shutdown and malfunction plan".

When the new COE was installed, Hutchinson balanced the capture system to insure that the Mmmm requirements were met. The permit to install that was issued, did not indicate that any submittals or plan updates were required within a certain time frame following or prior to installation of the new COE. If there are specific changes to the SSM related to the new COE that Mmmm requires, please let us know the specific changes and we would be happy to update the plan, as necessary.

Furthermore, an acceptable determination of the emission capture system for the chain-on-edge individual coating operations has not been made available. The single air flow monitor on the inlet to the RTO does not meet the monitoring requirements of 40 CFR 63.3968. 63.3968 states in part, "for each flow measurement device... locate a flow sensor in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the add-on control device".

It is the company's understanding from previous inspections that, providing the company performed necessary balancing of the system, it was adequate to monitor the combined air flow rate instead of the flow in each duct as you referenced in your email. This is also consistent with the EPA decision to allow the Hutchinson Cadillac facility to monitor total flow at the RTO in lieu of individual flows at each machine. Hutchinson has performed the necessary balancing and QA on the system to insure proper operation.

We make it **possible**

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Please identify the specific citation in 40 CFR Part 63 that will permit Hutchinson to utilize instantaneous temperature readings instead of the required 3-hour block average. 40 CFR 63.8 states in part, “an owner or operator who wishes to use an alternative monitoring procedure must submit an application to the Administrator”. Unless or until the Administrator receives and approves an alternative monitoring request, the basis Hutchinson has provided at this time is unacceptable.

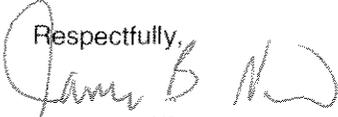
40 CFR 63.12 allows the state to implement the rule provided the implementation is not less stringent than the rule itself. We believe this is why the previous inspector indicated this was an acceptable operating procedure for meeting compliance. Maintaining instantaneous readings above the required operating temperature is much more stringent than meeting the requirement over a 3 hour average where there can be multiple times there the temperature drops below acceptable thresholds within the 3 hour period. If the MDEQ District office is no longer comfortable with this interpretation, Hutchinson will submit an applicability determination to the USEPA to allow for the instantaneous readings by March 6, 2015. In addition, Hutchinson plans to replace the current chart recorder with an electronic system. Hutchinson has contacted a supplier of these electronic systems and was told that the system could be operational by June 1, 2015. This electronic system will log the RTO temperature at least once every 15 minutes as required by MMMM. If the EPA denies the request for instantaneous readings, Hutchinson has the ability to add the 3 hour averaging to the electronic system.

Finally, please propose a specific date by which Hutchinson will submit a test plan for Method 204/capture efficiency and destruction efficiency to the Technical Programs Unit, submit an alternative temperature monitoring request and a date by which the facility will develop and implement an updated SSM Plan within 14 days of this e-mail.

Hutchinson has contacted Network Environmental to conduct the proposed testing. They are available April 16, 2015 to perform the testing. The protocol will be submitted no later than March 16, 2015. Test results will be submitted 60 days from the date of the test. Based on these results, Hutchinson will update the SSM plan within 30 days of receipt of the results, if necessary. Hutchinson prefers to have the results of the Method 204 test prior to proposing a date to implement changes in monitoring.

As mentioned in our NOV response, Hutchinson is dedicated to environmental compliance and is looking forward to working with you to resolve these issues. It may be helpful for you to discuss these issues with our environmental consultant directly. If you have any questions, please contact Sue Kuieck of FTCH at 616-446-2496.

Respectfully,



James B. Niesen
Maintenance Manager
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By email and USPS

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Ms. Lynn Fiedler – MDEQ
Ms. Mary Ann Dolehanty – MDEQ
Ms. Teresa Seidel – MDEQ
Mr. Thomas Hess – MDEQ
Mr. Walter Jenkins – Hutchinson
Mr. Gregg Gallagher – Hutchinson
Mr. James Todoroff – Hutchinson
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