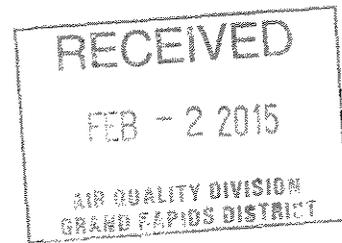


February 2, 2015

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



Re: Response to Violation Notice
Hutchinson Antivibration Systems, Inc. (SRN No. E5094)
Grand Rapids, Michigan

Dear Ms. Lazzaro:

This letter is in response to the violation notice dated December 15, 2014. This letter was not received by Hutchinson personnel until January 5, 2015. We appreciate the additional response time due to this fact.

Before we respond to the individual issues cited in the letter, Hutchinson would like to convey our disappointment at receipt of this letter. Hutchinson has had a long-standing history of working well with the MDEQ inspectors and has implemented programs at the facility that were intended to keep the facility in continuous compliance. The facility has spent millions of dollars on controlling VOC and HAP emissions and even installed interlocks so that the equipment could not operate outside the boundaries of the permit, as agreed upon with former MDEQ personnel. We are very concerned that a different inspector could have such a difference of opinion regarding our compliance status. Hutchinson has historically worked closely with the MDEQ to resolve any issues or misunderstandings and continued to be open to this following the December inspection. Hutchinson realizes that it takes some time for an inspector to become familiar with a facility and its permit and that with this transition some issues may arise. However, Hutchinson would have preferred to resolve these issues working one on one with our inspector first in communication outside of the boundaries of violation notices and enforcement. Hutchinson strives to comply with our permit and is open to suggestions to improve its compliance programs. It is difficult to comply when opinions can vary so significantly between inspectors as to what constitutes compliance. If a new inspector does not agree with the former inspectors' analyses of our permit and compliance system, there should be some initial discussion and adjustment period to clarify and resolve any issues. The permit has not changed since the 2013 inspection nor have Hutchinson's programs to ensure compliance with the permit, monitoring or recordkeeping.

Hutchinson appreciates having the opportunity to meet with you. We were hoping that this meeting would have given us more opportunity to resolve these issues outside of the more formal violation response process.

Following is Hutchinson's response to the individual issues noted in your letter. The item is listed with our response provided below.

- **MI-ROP-E5094-2012b, EURTO, Special Condition V.1 – Failure to conduct a capture efficiency test in the past 5 years.**

Hutchinson conducted destruction efficiency testing in May 2013. The MDEQ-Air Quality Division inspector and Technical Programs Unit personnel determined that capture efficiency was not required because the equipment qualified as a permanent total enclosure and recommended that only destruction efficiency be performed. The stack test report and stack test protocol were accepted by the MDEQ. There was no indication from the MDEQ in May 2013 that the capture efficiency testing stated in the permit was still required.

As we discussed at our meeting, Hutchinson may choose to perform a Method 204 analysis on the equipment. However, this should not be required to rectify this issue.

- **MI-ROP-E5094-2012b, FGMMMM, Special Condition III.1.a – Failure to maintain average combustion temperature above limit**

Based on our discussion during our January 14, 2015, meeting, it seems that you relied upon the notice of compliance status (NOCS) to determine the appropriate temperature. The NOCS listed a minimum temperature for the RTO of 1550° Fahrenheit +/- 100°. This language was reflective of our prior permit, which was always interpreted to mean a minimum operating temperature of 1450° F. Our permit has been updated to state a minimum temperature of 1450° F. The Company has interlocks in place that do not allow the adhesive machines to operate if the temperature of the RTO falls below this temperature. These interlocks have been in place for many years. The MDEQ was aware that this was the set point we used to define proper operation of the RTO. Hutchinson has guaranteed destruction efficiencies at this temperature of greater than 95% from the manufacturer of the RTO. Emissions at this destruction efficiency are well below the MMMM emission limits. So the NOCS form on file from 2008 does not cause additional confusion with our requirements, we are submitting revised forms to reflect our permit limit. These revised forms are attached to this letter. Once again, our system is interlocked to prevent the temperature from going below 1450° F.

- **MI-ROP-E5094-2012b, FGMMMM, Special Condition VI.4.a(i-iii) – Failure to determine the average of all recorded readings for each successive 3-hour period**

Hutchinson has a system that continually records the operating temperature of the RTO. Because the coating equipment cannot operate if the temperature of the RTO falls below 1450° F, all instantaneous readings are greater than 1450° F, which makes a 3-hour block average unnecessary. The computer equipment and networking required to add the capability of doing this sort of averaging costs in excess of \$20,000 and generates mass amounts of data. If the 2008 NOCS is revised to include the temperature requirement to 1450° F as discussed above, this averaging should not be necessary. Hutchinson will maintain individual readings above the required operating temperature.

- **40 CFR 63.3963(c) – Failure to demonstrate compliance with operating limit for the RTO combustion temperature**

As discussed above, it was the Company's understanding that we were complying with the required operating limit for the RTO combustion temperature.

- **MI-ROP-E5094-2012b, FGMMMM, Special Condition III.3 – Failure to develop and implement a written startup, shutdown and malfunction plan for capture system**

Hutchinson submitted a startup, shutdown, malfunction plan (SSM Plan) to the MDEQ in August of 2012. No deficiencies in this plan were noted. There have not been any changes in the processes that require updating the plan since that time.

- **MI-ROP-E5094-2012b, FGMMMM, Special Condition III.4 – Failure to properly operate continuous parameter monitoring system (CPMS) for the add on control device**

This requirement as written in the ROP is quite generic. The Company's understanding of the requirement, based on previous inspections, was that our flow rate monitor on the RTO complied with the CPMS requirements. The Company verifies the accuracy of this monitor and balances the entire capture system quarterly. During this quarterly balancing, the flow rates in each hood are checked and face velocities at

each opening are verified and compared to the standard. Hutchinson continues to implement this compliance plan and does not believe we are in violation of this requirement.

- **MI-ROP-E5094-2012b, FGMMMM, Special Condition VI.7 – Failure to install and operate properly CPMS for the emission capture system**

As discussed above, the Company's understanding was that the RTO flow rate monitor complied with the CPMS requirements.

- **40 CFR 63.3965(b) – Failure to determine emission capture system efficiency**

As previously noted, this was deemed unnecessary because the capture systems qualified as permanent total enclosures.

- **40 CFR 63.3967(f) – Failure to establish emission capture system operating limits**

This requirement does not apply to permanent total enclosures.

- **40 CFR 63.3963(c) – Failure to demonstrate continuous compliance with operating limit for emission capture system**

As discussed above, the Company's understanding was that the RTO flow rate monitor complied with the CPMS requirements.

- **40 CFR 63.3890(b)(4) – Failure to comply with organic HAP emission limit**

The maximum controlled pounds of HAP per gallon of solids for the most recent 12-month period prior to the inspection using the permanent total enclosure capture efficiency and the destruction efficiency from the May 2013 stack test was 2.75 lbs HAP/gal solids. The emission limit for rubber to metal bonding under MMMM is 37.7 lbs HAP/gal solids. Even if the 100% capture was not used, a capture efficiency of only 4% would be necessary to comply with the MACT emission limitations.

- **MI-ROP-E5094-2012b, FGMMMM, SC VII.4 – Failure to report deviations**

The Company was unaware of any deviations that were not reported. If the Company agrees that any of these issues constitute a deviation, they will be reported on the upcoming annual report.

- **40 CFR 63.3920(c) – Failure to take action consistent with the startup, shutdown, and malfunction plan**

The Company has set up physical interlocks on the coating equipment so that it cannot operate during a startup, shutdown, or malfunction of the RTO to maintain compliance with the permit.

- **40 CFR 63.3920(c) – Failure to submit startup, shutdown and malfunction report**

There were no startups, shutdowns, or malfunctions to report.

In a good faith effort to resolve these issues and misunderstandings, Hutchinson would like to propose several activities that should help document these items in the MDEQ file and set the record straight for the future. Hutchinson will have a Method 204 analysis performed on our equipment. If the equipment does not qualify as a permanent total enclosure, the facility will do a capture efficiency test. Hutchinson also proposes to perform a destruction efficiency test at normal RTO operating conditions of 1450° F. If the MDEQ agrees with this approach, we would like to work with you to develop a schedule of the proposed actions.

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If changes are necessary as a result of the proposed testing to monitoring requirements, SSM plans, or any of the CPMS, Hutchinson will work with the MDEQ to develop a schedule to expeditiously implement the required changes.

We look forward to working with you to resolve these issues.

Sincerely,

HUTCHINSON ANTIVIBRATION SYSTEMS, INC.



James B. Niesen

Attachments

By email and USPS

cc/att: Ms. Heidi Hollenbach – MDEQ (By email)
Ms. Prudy Blue – MDEQ (By email)
Ms. Lynn Fiedler – MDEQ (By email)
Ms. Mary Ann Dolehanty – MDEQ (By email)
Ms. Teresa Seidel – MDEQ (By email)
Mr. Thomas Hess – MDEQ (By email)
Mr. Walter Jenkins – Hutchinson (By email)
Mr. Gregg Gallagher – Hutchinson (By email)
Mr. James Todoroff – Hutchinson (By email)
Ms. Lynn Spurr – Fishbeck, Thompson, Carr & Huber, Inc. (By email)
Ms. Sue Kuieck – Fishbeck, Thompson, Carr & Huber, Inc. (By email)