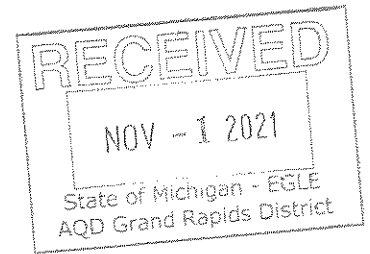


October 27, 2021

Mr. Dave Morgan  
Michigan Department of Environment, Great Lakes and Energy  
Air Quality Division  
Grand Rapids District Office  
350 Ottawa Avenue NW – Unit 10  
Grand Rapids, MI 49503-2341



Re: Response to Violation Notice Dated September 30, 2021  
Hutchinson Antivibration Systems, Inc. (SRN No. E5094)

Dear Mr. Morgan:

This letter is in response to your Notice of Violation dated September 30, 2021. Hutchinson was disappointed to receive the Notice of Violation. Hutchinson heard your concerns related to the issues cited during the inspection and has been working diligently to correct these issues. The following is Hutchinson's response to the individual issues noted in your letter.

- **Failure to comply with ROP requirement to conduct interlock integrity test at least once every two years.**

Hutchinson missed the deadline for the once every two year requirement for the interlock testing. This is not an ongoing violation. Hutchinson has worked closely with Hurst Mechanical to make sure the interlocks associated with the CPMS are working properly. Hurst verified the interlocks associated with the exhaust flow rate in April 2021. Hutchinson believed this satisfied the requirement to perform the interlock testing and did not realize the condition also required confirmation of the RTO temperature interlock as well as notification and reporting to EGLE. Hurst was not able to confirm the RTO interlock at the same time as the airflow as this would entail shutting down the entire cement department which has to be coordinated with production. Hutchinson prefers to have Hurst onsite during the confirmation of the interlock checks so that if an issue is found, it can be immediately addressed. Hutchinson has contacted Hurst for availability to be onsite during the interlock test and is currently trying to coordinate schedules with both Hurst and with plant management to schedule the test for November 2021. A written notice of the upcoming test to the Air Quality Division will be provided at least 2 weeks before the date of the test. A follow up report, summarizing the test and its outcome will be sent to the division once the test is complete. Hutchinson has also added this requirement to the plant's environmental compliance calendar and to the plant's PM tracking system to ensure future compliance with this testing requirement.

- **Failure to comply with fugitive emissions minimization and MAP to conduct weekly odor checks to minimize emissions.**

Hutchinson will ensure the weekly checks are completed and documented as required in our MAP, which includes documentation of findings and associated actions. Hutchinson is also investigating different styles of cement booth pots and seals to reduce emissions as well as different seals for the doors on the machine locks. Hutchinson will provide EGLE an update on this investigation by December 1. Once Silver 1 is replaced with Chain on Edge 2, the RTO may have additional capacity where some/all of the pots can be exhausted with a ventilation system controlling the emissions with the RTO. Hutchinson anticipates the new chain on edge will arrive before the end of the year and anticipate the machine to be running in first quarter of 2022. Special Condition No. VII.1 of PTI No. APP-2021-0134 requires that Hutchinson notify EGLE when the installation is complete. Hutchinson will include the results of their investigation into exhausting the paint pots to the RTO in this notice.

If you have any questions or require additional information, please contact our consultant, Sue Kuieck with FTCH at 616.464.3721 or [slkuieck@ftch.com](mailto:slkuieck@ftch.com).

We make it *possible*

headquarters  
GRAND RAPIDS  
460 Fuller N.E., PO Box 1886  
Grand Rapids, MI 49501  
Tel: (616) 459-4541 - Fax (616) 459-7053

CADILLAC OPERATION  
600-7<sup>th</sup> Street, P.O. Box 209  
Cadillac, MI 49601  
Tel: (231) 775-9737 - Fax (231) 775-4343

SALES OFFICE  
1060 Centre Drive  
Auburn Hills, MI 48326  
Tel: (248) 375-4183 - Fax (248) 920-5046



Sincerely,

HUTCHINSON ANTIVIBRATION SYSTEMS, INC.

A handwritten signature in black ink, appearing to read 'Jeff Brosman'.

Jeff Brosman

lkj

Attachments

By email and USPS

cc/att: Ms. Jenine Camilleri – EGLE-AQD

Ms. Kaitlyn Laug – Hutchinson

Mr. Jim Niesen – Hutchinson

Ms. Sue Kuieck – Fishbeck

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