



MERCURY DISPLACEMENT INDUSTRIES, INC.

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10/18/2016

To: Dennis Dunlap and the Michigan Air Quality Division,

Re: Violations of Unpermitted Mercury Operations at SRN - N5886.

Date of Inspection: June 6 , 2016



Mercury Displacement Industries, Inc. (MDI, Inc. or MDI) fully intends to correct these violations as soon as possible. The violations have occurred since the inception of the state regulations regarding permits on pollution generating processes or equipment. Mercury manufacturing of electrical switches and relays has been happening at this location since 1974.

The Michigan AQD was here back in the early 2000's taking mercury readings. There was no mention of equipment not being permitted at that time. MDI filed the MAERS reports in the early 2000's on solvent emissions. That was stopped when our usage volumes did not meet reporting thresholds. I only make these statements to assure you that MDI was in no way trying to break the law in our operations. We simply did not know the regulations. We incorrectly believed the annual TRI report was our notification to the federal and state government divisions about our toxic releases.

The violations are ongoing. Based on MDI using about 10 Tons of mercury during 2015 and an emission factor of 8 lb/ton mercury (from Table 4-5, EPA # 260-B-01-004, SIC code 3625, Electrical switch manufacturing (uncontrolled)), we emitted 80# of mercury, or 0.04 tpy, below the 0.1 tpy from Appendix A, Federal Significant Emission Rates. In 2016 we are on pace to emit 70.1 #, or 0.035 tpy.

We are working diligently at finding a Mercury filter system that will allow us to remove Mercury vapor from our exhaust systems. Initially, it looks like we will try to use an activated carbon , possibly AddSorb VQ1 , manufactured by the Jacobi Corporation. We are working with possible vendors that will incorporate a filter system for each of our exhaust systems. Two designs will be necessary, one for the the mechanical blower systems for the Mercury fill station and solder station, and one each for the Welder's exhausts. It needs to be done right, so finding a company to solve these issues needs to be investigated thoroughly. It is very necessary to do it right to prevent any future reoccurrence. I believe we should be able to accomplish this project's goals, hopefully, within the next 60 days, or sooner if possible. Hopefully this is an acceptable goal.

Sincerely

Mike Brewster