

From: Mueller, Josh [mailto:joshm@haviglandusa.com]
Sent: Friday, September 23, 2016 11:28 AM
To: DeVries, Kaitlyn (DEQ)
Subject: RE: Inspection Report

This email is intended to serve as the written response required by the violation notice dated 2016-9-2.

Dates the violations occurred: All violations were observed during the MDEQ inspection on 2016-8-4

Information to be provided:

1. Explanation of the causes and duration of the violations:
2. Whether violations are ongoing:
3. 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
4. Steps that are being taken to prevent reoccurrence:

Mixing Tanks – North Facility

1. The mixing tanks were believed to be exempt from a Permit to Install because of their limited emissions (emissions below those defined in Rule 290).
2. Ongoing
3. Havigland has started the process of completing a Potential to Emit calculation to determine if a Permit to Install is required. The target completion date for this project is 2016-10-31.
4. Havigland is in the process of hiring an additional staff member to support the Environmental, Health, and Safety Department. We feel that this additional resource will afford the department the time to update and maintain air permit records as required.

Scrubber – Corner Building

1. The differential air pressure gauge was not reading the pressure drop across the media bed in the scrubber because the lines connected to the gauge were flip-flopped.
2. Fixed
3. The scrubber was evaluated following the MDEQ inspection and the connections were corrected on the spot.
4. The Engineering Department is formalizing a Preventative Maintenance Plan which will ensure that monitoring equipment is operating correctly.

Powder Packaging Area – Corner Building and Associated Scrubber

1. The Corner Building operations were believed to be exempt from a Permit to Install because of their limited emissions (emissions below those defined in Rule 290).
2. Ongoing
3. Havigland has started the process of completing a Potential to Emit calculation to determine if a Permit to Install is required. The target completion date for this project is 2016-10-31.
4. Havigland is in the process of hiring an additional staff member to support the Environmental, Health, and Safety Department. We feel that this additional resource will afford the department the time to update and maintain air permit records as required.

Chromium Mixing Area – East Facility

1. The mixing tanks were believed to be exempt from a Permit to Install because of their limited emissions (emissions below those defined in Rule 290) as well as qualifying for 290 exemption.

2. Ongoing
3. Haviland has started the process of completing a Potential to Emit calculation as well as actual monthly emission calculations. The target completion date for this project is 2016-10-31. Following that project Haviland will complete and submit a Permit to Install, the target for that project is 2016-11-15.
4. Haviland is in the process of hiring an additional staff member to support the Environmental, Health, and Safety Department. We feel that this additional resource will afford the department the time to update and maintain air permit records as required.

Preventative Maintenance Plan and Malfunction Abatement Plan for all pollution control equipment – Haviland does have preventative maintenance activities scheduled for pollution control equipment but is in the process of gathering and organizing this information into a formalized Preventative Maintenance Plan. The Engineering Department is focusing on the Corner Building and Chromium Mixing areas first and has set a target date of 2016-10-31 to complete this project, including development of Malfunction Abatement Plans. After information for Potential to Emit calculations have been gathered the Engineering Department will be able to determine the scope of a project to create similar plans for all other applicable equipment. The target date for establishing the second phase of this project is 2016-11-15.

I hope the information provided has satisfied the requirements stated in the violation notice. It is Haviland's goal to always operate in compliance of all applicable laws and regulations. We are working diligently to correct the deficiencies stated in the violation notice and are utilizing our resources to the best of our ability given the recent EPA inspection and information requests from those inspections. I plan on providing progress updates periodically and hope that will ensure an appropriate response to the violation notice. Please let me know if you have any questions, comments, or concerns.

Thank you

Josh Mueller | Environmental, Health, and Safety Manager

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