



HAV-18-064-LTR

October 18, 2018

DEQ-AQD  
Grand Rapids District  
350 Ottawa Avenue NW Unit 10  
Grand Rapids, MI 49505

Dear Ms. DeVries,

This letter is in response to the violation notice dated October 2, 2018. To recap, FGWESTPOWDER and EUWESTMFG both were sited with Rule 910 violations for failure to properly operate a pollution control device. FGWESTPOWDER is currently under consent order AQD 2018-1. A written response was requested to be submitted by October 23, 2018 regarding the cited violations. The following details the violations and corrective actions:

- EUWESTMFG – Rule 290 violation
  - **Dates the violation occurred:** August 30, 2018
  - **Explanation of cause and duration of violations:** On August 30, during the inspection of the Liquid Blending Scrubber for EUWESTMFG, it was observed in the violation notice that the scrubber “had noticeable fouling, including foam in the scrubber tank, and the mesh pads were orange in color”. Upon further examination of the mesh pads on the inlet and outlet side of the scrubber, no noticeable fouling or orange color was observed. Instead, the inspection windows were a discolored yellow/brown color where exposed to the sun. Photos are included in Attachment 1 and Attachment 2. Based on the start-up of the unit from the prior day, the foaming incident did not exceed a 24 hour period.

The violation notice also noted the “calibrations of the pH and the conductivity gauges are overdue”. When discussing these gauges with the Engineering Manager (and acting West Production Manager at the time of the violation), he conveyed this instrumentation is not necessary for the proper operation of the scrubber. The purpose these gauges serve is for the analysis of discharge water for wastewater treatment. Since the discharge is routed to a wastewater treatment area prior to being discharged to the city, then the pH and conductivity measurements on the scrubber reservoir are not needed. Rather, proper scrubber operation is dependent on recirculation flow and foaming. These two parameters are monitored visually during the startup and shutdown of the unit on a daily basis and about 2-3 times per shift.

- **Are the violations ongoing:** No, when foaming does occasionally occur (about every 3 weeks), anti-foam is added.
  - **Corrective action that has taken place or proposed and dates these actions will occur:** A differential pressure gauge will be installed to monitor the performance of the scrubber bed. The gauge will better assist operations when foaming is occurring in the bed. This new gauge will be installed by February 8, 2019.
  - **Steps being taken to prevent a reoccurrence:** As mentioned in the corrective actions, a differential pressure gauge will be installed to assist in tracking foam across the scrubber bed. A scrubber operations log will be implemented to track performance as well.
- FGWESTPOWDER – Rule 290 violation
    - **Dates the violation occurred:** August 30, 2018
    - **Explanation of cause and duration of violations:** The emission of particulates to the roof of the manufacturing area was caused by second shift employees leaving the scrubber line connected to the powder blender while mixing was taking place. This caused abnormal short-term loading of the scrubber during the mixing process that typically lasts 10 – 15 min. The high loading caused some of the material to bypass the scrubber bed and was emitted out the exhaust stack.
    - **Are the violations ongoing:** No, the employee group was retrained on the operation of the powder blending equipment to disconnect the scrubber line while the mixer is in use. The wet scrubber is designed for dust control during blender loading and product packaging operations.
    - **Corrective action that has taken place or proposed and dates these actions will occur:** Employee re-training was completed on September 10, 2018.
    - **Steps being taken to prevent a reoccurrence:** Standard procedures will be written regarding the proper use of emission control equipment during powder blending operations. Both first and second shift will be trained on the same standard procedure. This will be completed by December 3, 2018.
  - FGWESTPOWDER, SV-7 – Particulate Testing
    - Haviland is currently working with various environmental companies gathering quotes as well as determining testing methods needed that will capture total PM, filterable PM10, and filterable PM2.5. Our goal is to have the particulate testing completed by January 31, 2019. This date will be dependent on port installation, West powder production schedule, testing company's available dates, weather, and TPU's schedule to be on-site.

If you have any questions, please contact me at (616) 365-3654 or [brittanya@havilandusa.com](mailto:brittanya@havilandusa.com).

Sincerely,

A handwritten signature in cursive script that reads "Brittany Albin".

Brittany Albin  
Environmental Engineer

Cc: Ms. Jenine Camilleri, Enforcement Unit Supervisor  
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