

56-01-008

HENNIGES
AUTOMOTIVE
IOWA INC.
3200 MAIN STREET
KEOKUK, IOWA 52632

June 14, 2010

Kurt Levetzow
Iowa DNR - Field Office 6
1023 W. Madison St.
Washington, IA 52353



Dear Kurt,

In response to your email of June 10, 2010 concerning your observation of opacity being emitted from our stacks, I did a series of Method 9 observations and found the opacity on Extrusion Lines 5A, 10 and 13 to be in excess of the indicator opacities. All three lines had opacity of 30%. Line 5A indicator opacity limit is 20%, while Lines 10 and 13 are 25%.

On Friday, June 11 I began an investigation into the causes of this high opacity. On Line 5A I found that the primary to secondary bypasses that we installed last year were all in the closed position. After opening all 6 bypass valves the opacity from Line 5A was read as 10%. The valves appeared to have been inadvertently closed after the last cleanout of the stacks. The amount of opacity also is related to what product is being run and what compounds are being used. I will be doing more frequent opacity checks over the next few days to ensure that the opacity is below the indicator limit for all the products that we run on this line. Today the opacity was 15% coming from Line 5A primary.

Line 10 did not run on Friday so I wasn't able to make any corrections. Over the weekend Maintenance found that the linkage that controls the flow damper on the primary exhaust was broken. This was fixed and as soon as the line is up and running I will do some opacity readings. If this doesn't reduce the opacity to acceptable limits we can operate bypasses between the primary and secondary as was done on Line 5A. Line 10 is scheduled to run on 2nd shift today. I will be making adjustments to the bypasses and checking opacity readings. I will update you with results as soon as I have them.

On Line 13, Maintenance found that the flow regulator on the primary exhaust was not fully opened. This was corrected over the weekend. However, opacity readings taken this morning indicate that this adjustment did not reduce the opacity below the indicator of 25%. Since the adjustments made did not correct the problem, bypasses between the primary and secondary will be added to Line 13. This will give us the capability to control the opacity similar to Lines 5A and 10. As soon as I have the dates to complete this project I will send an update.

Sincerely,

Joe Lehrter
Senior EHS Specialist
Henniges Automotive Iowa Inc.
3200 Main Street
Keokuk, IA 52632

