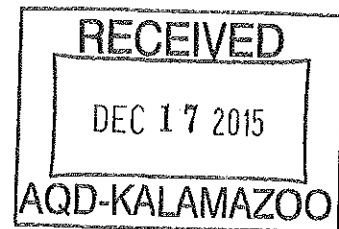


Tri-K Cylinder Service Inc. • 4539 Wayne Rd. • Springfield, MI 49037

December 14<sup>th</sup>, 2015

Rex I. Lane  
Senior Environmental Quality Analyst  
Air Quality Division  
7953 Adobe Road  
Kalamazoo, MI 49009-5025



**RE: VIOLATION NOTICE RESPONSE**

Dear Mr. Lane:

This correspondence is in response to your November 17<sup>th</sup>, 2015, letter/violation notice. The letter identified "failure to comply" with the NESHAP 40 CFR 63.342(f)(3)(i)(F) amendments (40 CFR, Part 60, Subpart N).

Per our conversation on November 17<sup>th</sup>, Tri-K Cylinder Service Inc. has always adhered to the NESHAP 40CFR 63.342 regulations and followed our operation plan to monitor ongoing compliance of these regulations. I was unaware of the amendments (or changes) to the regulation with respect to modifying the use of fume suppressants containing PFOS. Tri-K Cylinder Service Inc. demonstrated compliance of the NESHAP regulations using a fume suppressant. As required we continued monitoring and using the fume suppressant used to demonstrated compliance on January 15<sup>th</sup>, 1999. Tri-K is a very small one-man operation and is not a member of any professional industry subscriptions or organizations.

The following bullet points specifically address your concerns with respect to the violation notice:

- As outlined in your letter the use of a fume suppressant, that was once approved but is no longer approved, was identified on November 17<sup>th</sup>, 2015. The use of this fume suppressant was consecutive from January 15<sup>th</sup>, 1999 to November 17<sup>th</sup>, 2015.
- The use of a fume suppressant containing PFOS allowed us to properly monitor our surface tension to maintain the variables necessary to monitor compliance as

demonstrated by our on-site stack test. The implementation of the NEW amended fume suppressant requirements, which does not allow the use of a fume suppressant containing PFOS, went into affect on September 19<sup>th</sup>, 2015. The duration of improper use of a fume suppressant containing PFOS was approximately 2 months. Although the use of this fume suppressant should have had no negative impact on my chrome emissions it is no longer acceptable because of the PFOS.

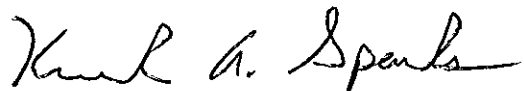
- Once I was made aware of the amendment (NESHAP 40CFR, Part 60, Subpart N), which no longer allows for the use of a fume suppressant containing PFOS, a suitable alternative was pursued, purchased and implemented.

**To conclude:**

Tri-K Cylinder Service Inc. has switched to using a PFOS free fume suppressant. We no longer have any fume suppressant in-house that contains PFOS. Tri-K will continue to monitor our surface tension maintaining our variables to demonstrate NESHAP compliance. Tri-K is currently using a Hunter Chemical product for its fume suppressant. The replacement fume suppressant that we are now using is a PFOS free HCA-8.2 Fume Control. As mentioned, this product replaces the previously approved and used Fumetrol 140. The type of monitoring and additions is similar to that of the previously used product. This product change to comply with the new amended regulation was relatively effortless. There was no advantage for Tri-K to avoid the new regulation. The short time that Tri-K used a PFOS fume suppressant was the result of not being notified or knowledgeable of the modification (amendment) to the allowable requirements. To help prevent this from happening again we will periodically monitor the DEQ/EPA website for any future amendments to the NESHAP chrome emissions requirements.

I have enclosed the MSDS sheets (6), and product information sheets (2) for the new PFOS free fume suppressant that we are now using. If you need anything further please contact me with your request(s).

Best Regards,



Kurk A. Sparks/President