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October 24, 2014

Matt Deskins
Environmental Quality Analyst
Air Quality Division
7953 Adobe Road
Kalamazoo, MI 49009-5025

Matt,

Corrective action taken on violation notice SRN-A0083 Berrien County received 9/26/14 (Euchrome 3/5). I was not aware that I had to modify my permit when NESHAP lowered the variance to +/-2 on our magnehelic gauges. What does this consist of?

Your visit on September 9, 2014 coincided with our scrubber pads being power washed. We do this 2 to 3 times per year when our magnehelic gauges reach around 5.5 to 6. After your visit we took our spare gauge and crossed with our process gauges. We found our process gauges slightly off. We then disconnected our process gauges and pressure blew the lines out. Calcium chloride had built up on air tubes in the unit and we gained a few more points.

On October 8, 2014 we had our exhaust pipe repaired which made a large difference in the water column reading. Our readings are around 3. This unit was tested and set at 3.5 to 5.5. Back in 1978 with a mean of 4-6 NESHAP'S +/-2 puts us at 2.6 to 6.6. I don't see 3 as a violation.

We also phoned in (KCH) to do a (PMA) – see the attached proposal. His advice was to wash #3 pads as we have not used this side of the scrubber for several years. We have not been power washing these pads. He suggested these pads being plugged up would alter water column readings. These pads are scheduled to be power washed this weekend (FGFACILITY).

I believe that we have good work practices and inspections. The only thing that was not done right is that we did not litigate what we did quarterly. This has been taken care of (FGFACILITY).

I don't know where this 15 seconds wash down came from. Manufacturer of said units recommends wash down as needed. As a waste minimization program I reduced #3/5 to 9 seconds and #6 to 12 seconds as the water coming out of these units was clean after said time.

This is the first malfunction we've had and I attribute it to the outlet stack cracking. I had the stack fixed after finding someone that could actually do it.

Your comments are welcome and results of water column after 3 sides washdown will follow.

Sincerely,

E. Tom Sosnowski
President

SODUS HARD CHROME, INC.

cc: file/air