



November 14, 2022

Mark Dziadosz, Senior Environmental Quality Analyst  
Air Quality Division  
Michigan Department of Environment, Great Lakes, And Energy  
Warren District Office  
27700 Donald Court  
Warren, Michigan 48092

**Re: Tribar Technologies Plant 1 – Response to Violation Notice Dated October 24, 2022**

Dear Mr. Dziadosz:

Tribar Technologies Inc. (Tribar) has prepared this letter with assistance from Barr Engineering Co. to address the issues outlined in the Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division Violation Notice dated October 24, 2022. The violation notice (VN) alleges the following:

FG-COATLINE SC XIV Facility was exceeding temperature of 194 °F when air-dried automotive coatings are being cured. During the inspection, a temperature of 207° was observed. During a meeting with Tribar staff Ryan O’Keefe and Darrel Dotson on August 26, 2022, it was indicated this limit may have been exceeded for at least two years.

FG-COATLINE SC XVIII Facility has not provided records of the cure oven temperature records for the previous six month, which were requested multiple times. AQD is now requesting previous two years of cure oven temperature records based on conversation with Tribar staff.

Responses to both issues are addressed below.

*FG-COATLINE SC XIV Facility was exceeding temperature of 194 °F when air-dried automotive coatings are being cured. During the inspection, a temperature of 207° was observed. During a meeting with Tribar staff Ryan O’Keefe and Darrel Dotson on August 26, 2022, it was indicated this limit may have been exceeded for at least two years*

The permit to install (PTI) No. 274-98A and the Supplement to Permit to Install No. 274-98A for Tribar Plant 1 indicates the oven portion of FG-CAOTLINE shall not cure parts at temperatures greater then 194°F when air-dried automotive coatings are being cured. The PTI indicated the Monorail Cure Oven, North Cure Oven and South Cure Oven as a portion of the FG-COATLINE. Upon investigation of the violation, Tribar identified the Parts Washer Dry-Off

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Oven as the oven the violation is referencing, not the cure ovens pertinent to the PTI. Tribar communicated the identification with Mark Dziadosz via email on November 7, 2022. Upon no response, Tribar contacted Mr. Dziadosz via phone on November 10, 2022 with no response, an email follow-up was sent to Mr. Dziadosz on November 10, 2022. No contact had been achieved by November 10, 2022 to Mr. Dziadosz. On November 10, 2022 Tribar contacted Joyce Zhu via email who communicated and understood the identified issue. Please see the attached email communication attempts to Mr. Dziadosz and the email communication to Ms. Zhu.

*FG-COATLINE SC XVIII Facility has not provided records of the cure oven temperature records for the previous six month, which were requested multiple times. AQD is now requesting previous two years of cure oven temperature records based on conversation with Tribar staff.*

Tribar has identified the incorrect oven was determined in the violation notice and has communicated this with EGLE AQD staff (please see the item above). Ms. Zhu indicated 6-month documentation was sufficient in response to this violation until further review has been completed by Mr. Dziadosz. The cure oven temperatures, as requested, have been posted on a OneDrive. Mr. Dziadosz gained access to this OneDrive on November 4, 2022. Please see the attached email communication attempts to Mr. Dziadosz and the email communication to Ms. Zhu. Also, please see the email communication to Mr. Dziadosz sent on November 4, 2022 granting access to the OneDrive.

Should you have any questions or concerns regarding this information, please do not hesitate to contact me.

Sincerely,



**Carlie Mohr**  
Environmental Health and Safety Manager  
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cc: Mary Ann Dolehanty, EGLE  
Anette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Joyce Zhu, EGLE

Attachments: Email Communication Between Mr. Dziadosz and Tribar  
Email Communication to Mr. Dziadosz, Joyce Zhu and Tribar  
Email Communication Mr. Dziadosz successfully accessing OneDrive