

October 19, 2022

EGLE, AQD Warren District Office 27700 Donald Court Warren, MI 48092

# Re: Tribar Technologies Plant 1 – Response to Violation Notice Dated August 9, 2022

Dear Mr. Dziadosz:

Tribar Technologies Inc. (Tribar) has prepared this letter with assistance from Barr Engineering Co. (Barr) to address the issues outlined in the Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division Violation Notice dated August 9, 2022. The violation notice (VN) alleges the following:

Process Description	Rule/Permit Condition Violated	EGLE Comments
FG-COATLINE	Emission Limits S.C. 1-11	Facility was not able to show compliance with the limits in PTI 274-98A.
FG-COATLINE	Material Usage Limit S.C. 12	Facility was not able to show compliance with the corresponding material limits in PTI 274-98A.
FG-COATLINE	S.C. 18	Facility has not provided records of the cure oven temperature, although the inspector was able to observe the temperature during inspection.
FG-COATLINE	S.C. 20 a and b	Facility did not have records of the amount used of HAPs-containing materials, HAP content, or records of individual and aggregate HAP emissions.
Mixing room cold cleaners	Rule 707 (3)(a)	Three small cold cleaners were uncovered without parts being handled in the paint mixing room.

Process Description	Rule/Permit Condition Violated	EGLE Comments
FG-COATLINE	S.C. 21 a-e	Facility was not able to provide records of daily hours of operation and for each coating, reducer, cleanup, or purge solvent; amount used, VOC content, a daily volume- weighted average, pounds VOC on daily average, or 12-month rolling VOC tons per month.

## FG-COATLINE Emission Limits S.C. 1-11 and FG-COATLINE Emission Limits S.C. 21 a-e

The facility maintains daily records of coating throughput at the facility. These records include details to calculate the detailed information pursuant to FG-COATLINE S.C. 21 a-e. The attached tables for the previous 12 months (August 2021 – July 2022), as requested, demonstrates compliance with S.C. 1 through 5. However, upkeep of the daily coating categorical calculations has not always been managed as required in S.C. 6-11. The facility correcting any deficiency in calculations and has retained Barr to complete the required calculations using the daily records Tribar maintained. Tribar and Barr are working expeditiously to bring the required recordkeeping up to date and provide AQD the results soon. We are verifying the data for accuracy and developing a data entry template for operations to update on a daily basis. This should allow Tribar to maintain timely and accurate records to demonstrate compliance with the PTI No. 274-98A. An example of the daily record and monthly summary records demonstrating compliance with S.C. 1-5 is attached.

### FG-COATLINE Emission Limits S.C. 12

The facility rarely uses coatings which contain diethylene glycol monobutyl ether. For the 12-month period of August 2021 through July 2022, none of the materials containing diethylene glycol monobutyl ether were used. The diethylene glycol monobutyl usage is tracked on the daily records. Therefore, the facility is in compliance with S.C. 12 with diethylene glycol monobutyl ether emissions less than the permitted limit of 36 pounds.

#### FG-COATLINE Emission Limits S.C. 18

As noted in the August 2022 communications with Ryan O'Keefe, the facility unintentionally operated the oven over the 194 °F threshold. However, since notification, the oven temperature has been maintained below 194 °F. The facility monitors and records oven temperature using circular chart recorders. These are hard copy charts and are housed at the facility.

#### FG-COATLINE Emission Limits S.C. 20 a and b

Similar to the response to S.C.1-11, the facility maintains daily records of coatings and maintains HAP content of each coating. See attached 12-month table summary table for the requested period

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(August 2021 through July 2022). As noted, total HAP emissions are below the thresholds of 9.0 tons/year for a single HAP and 22.5 tons/year for aggregate HAPs.

#### Mixing room cold cleaners Rule 707 (3)(a)

According to the Site Activity Report (SAR) summarizing the inspection completed on July 21, 2022, the cold cleaners at plant 1 were in compliance with Rule 707 (3)(a), "The cold cleaners all had properly affixed lids with AQD operation instructions posted clearly... The facility appears to be in compliance with the requirements of Rule 707."

If you have questions or require additional information, please feel free to reach out to me.

Sincerely,

Wayne Ferris, Tribar Technologies Inc. Director of Operations

cc: Mary Ann Dolehanty, EGLE Annette Switzer, EGLE Christopher Ethridge, EGLE Brad Myott, EGLE Jenine Camilleri, EGLE Joyce Zhu, EGLE Teresa Kinder, Barr Engineering Co. Attachments: 12-month rolling average table Daily record example