

From: Nowak, Jason
Sent: Wednesday, October 2, 2024 5:13 PM
To: Robinson, Christopher (EGLE)
Cc: Malcolm, Daniel; Tanis, Daniel; Bice, Bob
Subject: RE: Violation Notice September 11, 2024; SRN: N2033

Mr. Robinson,

As discussed during our September 30, 2024 phone call, I am providing an email response on behalf of PPG Industries, Inc. ("PPG") to the alleged violations in the September 11, 2024 Violation Notice (VN) issued to PPG Industries, Inc., located at 1855 Industrial Drive, Grand Haven, Michigan 49417 (the "Facility").

PPG Responses to EGLE's Alleged Violations in the VN

- **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall not operate the following emission units unless the corresponding baghouse is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the pressure drop as described in the MAP. (R 336.1224, R 336.1225, R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))

PPG Response: The Facility plans to order and install all new supply tubing and pressure (magnehelic) gauges for each dust collector, per OEM specifications, as the current gauges are not original equipment. With the new gauges, the Facility will monitor baghouse pressure ranges and develop appropriate operating ranges for each baghouse. The Malfunction Abatement Plan (MAP) and daily pressure reading sheets will be updated, and submitted to EGLE, accordingly. This is anticipated to be completed at the end of November, barring any unforeseen lead times on gauges.

- **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate any emission unit in FGPCM unless a gauge, which measures the pressure drop across their respective fabric filter collector and sounds an alarm when the pressure drop reading exceeds -50 mbars, is installed, maintained and operated in a satisfactory manner. (R 336.1224, R 336.1225,

R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21 (c) & (d))

PPG Response: The Facility discussed the installation of an alarm with the OEM Contact for Donaldson Torit Dust collectors and for Neuman-Esser bag houses. Both companies indicated that there is no OEM magnehelic gauge offered with alarm capabilities, and they do not offer support for such gauge installation. They did offer advice on additional equipment that would be needed to retrofit an alarm, but stated that they cannot stand by it's reliability. The Facility also reached out to other PPG powder cluster maintenance managers to see if they had other solutions, and their

response was that they only monitor the gauges for differential pressure, with no alarms. PPG has issued a PO to a consultant for assistance with a permit modification, which will include, among other items, a request to remove the alarm condition from the permit. PPG feels that OEM gauges with an appropriate pressure range, and daily pressure readings with a plan of response for out-of-range readings, will meet the intent of “satisfactory operation”, as described in Permit No. 134-17A.

PPG will keep EGLE informed of the status on closing both of these items, and submit a follow-up closure email, with a revised MAP. Should you have any questions or need additional information, please feel free to contact me at the contact information below.

Thank you,

Jason Nowak

Regional Environmental Manager - Midwest

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