



April 19, 2023

Mr. Mark Dziadosz
 EGLE, AQD
 Warren District Office
 27700 Donald Court
 Warren, MI 48092

Re: Tribar Technologies Plant 5 (P0727) – Response to Violation Notice Dated February 8, 2023 and Second Violation Notice Date April 4, 2023

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 (AQD) Violation Notice (VN) dated February 8, 2023, March 2, 2023 email from Joyce Zhu, March 16, 2023 email from you to Scott Venman and Wayne Ferris, Second Violation Notice (SVN) dated April 4, 2023, and April 17, 2023 email exchange between AQD and me. The following summarizes the communications between Tribar and AQD and provides status of each of the items cited in the VN, SVN, and emails. The August 16, 2022 email from you to Ryan O’Keefe summarizes the recordkeeping request for the July 21, 2022 that is documented in the February 8, 2023 VN and April 4, 2023 SVN. The recordkeeping request email is attached to this letter as Attachment 1.

EUSYSTEM2 SC VI. 2, 3, 4 Records of inspections and pressure drop readings on packed bed scrubber and composite mesh pad system were requested to be sent after inspection on July 21, 2022. As of February 8, 2023, the records have not been received.		
August 16, 2022 Record Request	Tribar Response	Status
Operation and Maintenance Plan	Provided February 3, 2023	Complete
Surface Tension Records for Tanks 5 And 6 for the Previous Six Months (Jan 2022 – June 2022)	See October 19, 2022 Tribar Response to VN	Complete

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EUSYSTEM2 SC VI. 2, 3, 4 Records of inspections and pressure drop readings on packed bed scrubber and composite mesh pad system were requested to be sent after inspection on July 21, 2022. As of February 8, 2023, the records have not been received.		
August 16, 2022 Record Request	Tribar Response	Status
Differential Pressure Log and Inspection Records for Tanks 5 and 6 for Previous Six Months (Jan 2022 – June 2022)	<p>The differential pressure logs were provided in the April 17, 2023 email and are also attached as Attachment 2 to this letter.</p> <p>The inspection records for EUSYSTEM2 are provided as Attachment 3. Tank 6 quarterly inspection records are from 2Q2022 through 1Q2023.</p>	Complete

EUCHROME5 SC VI.2, 4 Records of inspections and pressure drop readings on composite mesh pad system were requested to be sent after inspection on July 21, 2022. As of February 8, 2023, the records have not been received.		
August 16, 2022 Record Request	Tribar Response	Status
Operation and Maintenance Plan	Provided February 3, 2023	Complete
Differential Pressure Logs for Tanks 45, 49, and 50 and Inspection Records for Tank 45 and 50 for the Previous Six Months (Jan 2022 – June 2022)	<p>The differential pressure logs were provided in the April 17, 2023 email and are also attached as Attachment 2 to this letter.</p> <p>Tank 45 is a trivalent chromium tank that has not been in service for years. Tank 49 is the decorative chromium plating tank and Tank 50 is the Chrome Plating Dragout, which are all controlled by a composite mesh pad system. Therefore, inspection records noted as Tank 45, 49 or 50 of the composite mesh pad system is the same system. On July 27, 2022, you sent an email stating that you had found the inspection sheets for Tank 49. See Attachment 4 for the July 27, 2022 email and the Tank 49 inspection records.</p>	Complete

FGSYSTEMS SC VI. 1, 2 Daily records of the pressure drop readings for each scrubber system in FGSYSTEMS system were requested to be sent after inspection on July 21, 2022. As of February 8, 2023, the records have not been received.		
August 16, 2022 Record Request	Tribar Response	Status
Operation and Maintenance Plan	Provided February 3, 2023	Complete

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FGSYSTEMS SC VI. 1, 2 Daily records of the pressure drop readings for each scrubber system in FGSYSTEMS system were requested to be sent after inspection on July 21, 2022. As of February 8, 2023, the records have not been received.		
August 16, 2022 Record Request	Tribar Response	Status
Differential Pressure Logs for EUSYSTEM1, EYSYSTEM3, EUSYSTEM4, and EUSYSTEM6 for the Previous Six Months (Jan 2022 – June 2022)	The differential pressure logs were provided in the April 17, 2023 email and are also attached as Attachment 2 to this letter.	Complete

The March 2, 2023 email from Joyce Zhu, the follow up email from you on March 16, 2023 and the SVN requested response to be incorporated into a written letter response. As provided in the April 17, 2023 email from me, the following provides the response in a written letter.

On March 2, 2023 requested identification of whom is responsible for recording the pressure drop readings and that the records are properly maintained. This request was also documented in the April 4, 2023 SVN. On April 17, 2023, I provided a response to the March 2, 2023 email as well as the April 4, 2023 SVN with the following statement:

I am also happy to share that within the next month, pressure drop readings will be integrated into our PM/ERP system (Plex). If the PM is not completed in Plex, it will have a flagged marker next to it indicating to management that this task has not been completed. These items are considered measurables and are reviewed daily. Until the system is deemed robust (approximately 1-2 month after implementation), all paper recorded pressure drop readings will come to both our maintenance manager, and then to me for approval.

As noted in this letter, each item requested from the July 21, 2022 inspection and subsequent correspondences has been addressed in this letter and is considered complete.

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

Sincerely,



Alexandria Muench, Tribar Technologies Inc. Environmental Manager

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE