



Brian Carley
Air Permit Division
Jackson District Office BLDG 4th floor
301 East Louis Glick Highway
Jackson, Michigan 49201



RE: Permit #MI-ROP-B1877-2014a - Notice of Violation

January 19, 2016

Brian,

On January 7, 2016 we received a Notice of Violation for exceeding Special Condition I.10 which limits sulfuric acid mist emissions to 1.6 pounds/hour (lb/hr). The alleged violation occurred due to a stack test retest for sulfuric acid mist emissions conducted October 22, 2015 which resulted in a 1.95 lb/hr average.

This is the second Notice of Violation received for not meeting the 1.6 lb/hr limit during stack testing. The previous Notice of Violation was received October 6, 2015 for stack test sulfuric acid mist emissions results of 13.3 lb/hr average from the July 21-22 tests.

At this time, we do not believe a violation has occurred, as we believe the stack test results do not accurately depict our actual emissions.

First, we feel that during the October 22, 2015 retest that the 3rd run sample was compromised due to the fact that the results of the first two runs were 1.09 lb/hr and 0.85 lb/hr respectively. The 3rd run resulted in 3.91 lb/hr. Second, based on a few phone calls with an EPA stack test methodology technical contact (Raymond Merrill), we believe the stack test method itself (CTM-13B) is a problem based on our stack exhaust parameters (i.e., existence of particulate based sulfur compounds, existence of SO₂, high moisture content, elevated temperatures, etc.). Third, our typical uncontrolled glass furnace SO₂ emissions are less than 2-3 lb/hr and our new ECS (Trimer control system) has demonstrated a very good SO₂ removal rate (so one would assume a high level of acid removal as well).

For these reasons, we have contracted another stack testing company to conduct our retest for sulfuric acid mist emissions. Also, we will be testing using both CTM-13B and CTM-13 simultaneously to see if there are problems with CTM-13B biasing results high due to sulfur compounds being picked up as acid in the test impinger train. We also plan to gather some additional engineering study data to help substantiate (or discredit) results. We plan to review SO₂ levels in the test impinger trains and compare data to our RATA-certified CEM SO₂ results.

We have locked in February 17, 2016 for our retest. We invite you and/or your representatives to attend this event. We will be running Green production during the retest. Our understanding is that we likely will be asked to also show that we can meet the 1.6 lb/hr limit while running PrivaGuard. We expect to transition back to PrivaGuard prior to shutting down for cold tank repair. As we get closer to that time, we will contact you and coordinate the testing with your schedule.

If you have any questions or concerns, please call me at 734-654-4283.

Sincerely,

Michael Smolenski
EH&S Manager