



To Whom it May Concern,

I'm writing in response to our second violation notice from our last EGLE inspection that was conducted on August 23, 2023, by Daniel McGeen at our Owosso, MI location on 201 S. Delaney Rd. Below are the listed violations that were found during our inspection and my responses on how the violations will be addressed in regard to the second violation letter written on November 8, 2023.

Violation #1- For 40 CFR Part 63, Subpart T. PTI 552-81C, EUDEGREASER, Special Condition 1.4 requires that the permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and T, as they apply to the degreaser. As identified during the inspection on August 23, 2023, not all provisions of Subpart T were met. Please see below for further details.

- Indoor wind speed was not regularly measured by Allied Motion to determine and record reduced room draft for degreaser, in violation of Section 63.466(d) of Subpart T. It has been decided that this will be enforced going forward as an anemometer has been purchased. We will measure to ensure that our wind speed is below 50 linear feet per minute and record the data every time the degreaser is being operated.

Violation #2- Additionally, it was not confirmed, but it was believed that the degreaser does not have a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser. This is required by Section 63.463(a)(5) of Subpart T. Please verify if there is the required vapor level control device and include that and any corrective actions in your response to this letter.

- It has been confirmed by the manufacturer that our degreaser does have a vapor level control switch" VLC". Below is the email that I received from the manufacturer confirming this. We did not know in the past that the VLC was on the degreaser until confirming it with the manufacturer. The manufacturer also supplied the electrical prints for the degreaser, if those need to be reviewed to see the VLC is in place.
- Email received from degreaser manufacturer:

Justin,

I assure you this degreaser, when fabricated and shipped. was in full compliance with the NESHAP regulations mandatory control device options. The control we discussed absolutely does exist on your degreaser and everyone that I have ever seen. The control is identified as VLC or "vapor level control". The probe for this thermostat is located just **above the water-cooled primary condenser coils**. Its job is to shut down the heat should your primary water cooling system fail and the vapor begin to rise above the coil level.



Thank you for taking the time to review my responses in regard to the violations that were sent to us in our second violation notice that was received on November 8, 2023. If there's any concerns or issues with the actions that are being taken in this letter, please contact me via phone or email as soon as possible so they can be properly addressed. My contact information is below.

Sincerely,

Justin Bukovick
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