



August 25, 2023

*Sent electronically only*

Mr. Mark Dziadosz  
 EGLE, Air Quality Division  
 Warren District Office  
 27700 Donald Court  
 Warren, MI 48092  
[DziadoszM@michigan.gov](mailto:DziadoszM@michigan.gov)

**Re: Tribar Technologies Plant 1 – Response to Violation Notice Dated August 4, 2023**

**Dear Mr. Dziadosz:**

Tribar Technologies Inc. (Tribar) has prepared this letter with assistance from Barr Engineering Co. to timely address the issues outlined in the Air Quality Division’s Violation Notice for Plant 1 dated August 4, 2023. The Violation Notice alleged the following:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
FG-COATLINE	Emission limit S.C. 6	Facility exceeded the Automotive Air-dried Prime- exterior plastic parts coating (black/red) VOC limit of 5.52 lb/gallon (calendar day- volume weighted average) in the records reviewed.
FG-COATLINE	Emission limit S.C. 7	Facility exceeded the Automotive Air-dried Basecoat interior/exterior plastic parts coating (black/red) VOC limit of 5.75 lb/gallon (calendar day-volume weighted average) in the records reviewed.
FG-COATLINE	Emission limit S.C. 8	Facility exceeded the Automotive Air-dried Basecoat interior/exterior plastic parts coating (non-black/red) VOC limit of 5.0 lb/gallon (calendar day-volume weighted average) in the records reviewed.

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
FG-COATLINE	Emission limit S.C. 9	Facility exceeded the Automotive Air-dried Clearcoat interior/exterior plastic parts coating (non-black/red) VOC limit of 4.5 lb/gallon (calendar day-volume weighted average) in the records reviewed.
FG-COATLINE	Monitoring S.C. 18	Facility is not continuously monitoring the temperature in the cure oven portions of FG- COATLINE. Data logger has been broken since June 23, 2023.
FG-COATLINE	Recordkeeping/ Reporting/ Notification	Records provided by facility before inspection on July 7, 2023 contained errors in the recordkeeping (including non-compliance). Spreadsheet had to be corrected to be reviewed.

A response to each of these items appears below.

Emission limits S.C. 6 through S.C. 9

Deviations from these four short-term emission rates were the result of unintended imbalances to the mix of different coatings used at the facility on a particular day. The usage of coatings that individually met the applicable lb/gallon emission rate sometimes decreased due to demand. Similarly, increases in the usage of other coatings, which individually exceeded the applicable emission rate, could also occur. One or both shifts in usage upset the balance relied upon for compliance, which could result in an average rate that might exceed the lb/gallon emission limit that applied to each category of operations on a particular calendar day.

To address this challenge, the facility has taken several steps. For starters, Tribar has limited the programs using high lb/gallon VOC coatings. For example, the facility ceased programs using High Gloss 2K Polyurethane Clearcoat, which individually exceeded the applicable clearcoat rate.

Similarly, the use of higher lb/gallon VOC coatings has been reduced. For example, the plant's use of a prime black-red coating, QC-1950HS, has been significantly reduced to the point that it is now categorized as a low-use coating (i.e., less than 55 gallons used in the 12-month rolling period) and exempt from the VOC content limit.

Further, the facility requires more thorough review of new coating formulations at the facility to evaluate if the VOC content will meet these categorical limits. New program lines are evaluated prior to contracting, let alone production, to monitor potential VOC content concerns in advance of scheduling production.

Given these changes, the facility has taken several different approaches to verifying compliance with each of these categorical emission limits going forward.

Monitoring S.C. 18 – Cure Oven Temperature Monitoring

As noted in the violation notice, the chart recorder for the monorail cure oven malfunctioned on or around June 23, 2023, which resulted in incomplete temperature records. Temperature has still been

monitored by staff using the digital display at the cure oven control terminal. Also, the oven control is set to cure parts at a temperature of 180 °F, which is necessary to avoid damaging the parts produced, thereby providing some additional buffer against the applicable 194 °F limit.

The facility has already obtained a new chart recorder, but still awaits additional components to connect the recorder with the existing oven equipment. To address this issue in the interim, staff will physically record the temperature three times per shift until the chart recorder system is fully functional. To address this issue long-term, the facility has ordered extra replacement parts to reduce potential delays in the event of future equipment malfunctions.

Recordkeeping/Reporting/Notification

As discussed during the site inspection with AQD, there were issues with nine data entries out of thousands over approximately 240 days. Seven of the nine errors were due to a value in the daily coating records that was inadvertently saved as a number rather than a percent value. The two other instances were due to typos in the daily coating records (e.g., 43.5 gallons instead of 4.35 gallons), thereby resulting in an errant average emission rate. These errors were corrected in the records submitted to AQD on July 17, 2023, which was three business days after encountering the error during discussions with AQD on July 12. To reduce the likelihood of recurrence, the recordkeeping tables now include conditional formatting to flag potential exceedances of the emission limits so that these typos and formatting errors can be identified and corrected in real time.

Tribar believes that this addresses each of the concerns raised by AQD, but please contact me with any questions or concerns.

Sincerely,

*Alexandria Muench*

Alexandria Muench, Tribar Technologies Inc. EHS Manager

c: Jon Gifford, Tribar  
Joyce Zhu, EGLE  
Scott Venman, Barr Engineering Co.  
Kurt Kissling, Warner Norcross + Judd