



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

August 21, 2019

Mr. David Bacon
Plasti Paint Inc.
801 Woodside Drive
St. Louis, Michigan 48880

Dear Mr. Bacon:

SUBJECT: Regenerative Thermal Oxidizer Destruction Efficiency Testing, Permit:
568-97D, SRN: N2422

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) has reviewed the protocol for testing at Plasti Paint in St. Louis. The regenerative thermal oxidizer that controls emissions from EUCOATINGLINE and EUSPINDLE will be tested for destruction efficiency. This testing is required by permit 568-97D.

Testing will be performed in accordance with Title 40 of the Code of Federal Regulations, Part 60, Appendix A, Methods 1, 2, 3, 4, and 25A. The RTO main inlet, the inlet from the oven, and the RTO outlet will be sampled. Three 60-minute runs will be performed on each stack. The wet bulb/dry bulb method may be used for moisture. The inlet oxygen and carbon dioxide may be assumed to be ambient; the RTO outlet stack gas will be sampled to determine oxygen and carbon dioxide concentration. Destruction efficiency will be determined on a pound per hour basis.

All requirements and specifications of the above methods apply; any modifications of the test methods onsite must be approved by the AQD.

The coating lines should operate at normal conditions during testing. The following process data will be recorded during testing:

- RTO chamber temperature; and
- Coating line and spindle line pressure drop, once during each run.

The test report will include:

- pitot tube calibration;
- field data sheets;
- the gas analyzer calibration error, system bias, zero and calibration drift data;
- run data and run averages, all in tabular format; and
- the process data listed above.

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All aborted or failed runs must be included in the report. A complete copy of the test report should be sent to:

Ms. Julie Brunner
EGLE, Air Quality Division
525 West Allegan Street
1st Floor South
Lansing, Michigan 48933

Ms. Karen Kajiya-Mills
EGLE, Air Quality Division
525 West Allegan Street
2nd Floor South
Lansing, Michigan 48933

Testing is scheduled for September 17, 2019. Please provide notification of any change in the test date to Ms. Julie Brunner of the Lansing District Office, at 517-275-0415, and to me. If you have any questions regarding this letter, please contact me by telephone or e-mail at gaslolit@michigan.gov.

Sincerely,



Tom Gasloli
Technical Programs Unit
Field Operations Section
Air Quality Division
517-335-4861

cc: Mr. Daniel Hassett, H & H Monitoring
Mr. Brad Myott, EGLE
Ms. Julie Brunner, EGLE