

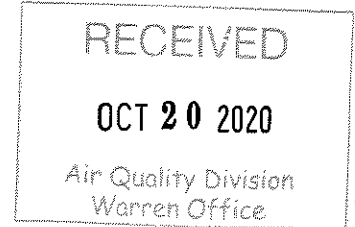


Coatings Services
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Matthew Ulewicz
General Manager

October 14, 2020

Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division, Warren District
27700 Donald Court
Warren, MI 48092-2793



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Posted
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**Re: The Crown Group Shelby (PPG) Plant, SRN: N7426
12020 Shelby Tech Drive, Shelby Township, MI 48316
Response to Violation Notice, dated September 28, 2020**

Mr. Forth:

I am writing in response to the above-referenced Violation Notice, dated September 28, 2020, that was sent to The Crown Group Company's Shelby Plant located at 12020 Shelby Tech Drive, Shelby Township, MI ("The Crown Group Shelby Plant"). The Crown Group Shelby Plant is owned and operated by The Crown Group Company, which is a wholly owned subsidiary of PPG Industries, Inc. The Crown Group Shelby Plant is timely submitting this response by October 19, 2020 as requested in the Violation Notice.

Alleged Areas of Noncompliance:

1. *During this inspection, Crown Group was unable to produce temperature records for the burn-off oven. The oven had a temperature monitor but had never been equipped with the device that automatically logs the temperature. This is a violation of the recordkeeping and emission limitations specified in Special Condition VI.1 and VI.3 of PTI number 187-18. The conditions of PTI number 187-18 required installation of a device to record the temperatures of the primary and secondary chambers of the burn-off oven by February 1, 2019. The permittee did not meet this deadline.*

Response: This alleged area of noncompliance has been fully resolved as the temperature logger was installed on September 15, 2020 prior to the issuance of the Violation Notice. In fact, The Crown Group Shelby Plant discovered the burn-off (heat cleaning) oven was unexpectedly not equipped with a device to record the temperature of the afterburner (thermal oxidizer) as per Special Conditions VI.1, VI.3, and IX.1(b) of PTI No. 187-18 prior to the EGLE air inspection on August 26, 2020. This discovery was unexpected because the temperature logger was included in the scope of work and quote for the burn-off oven upgrades that were installed on January 28, 2019, as authorized by PTI No. 187-818. These upgrades included an interlock system that shuts down the burn-off (heat cleaning) oven process burner when there is a loss of flame or air

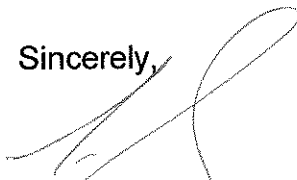
flow in the afterburner (thermal oxidizer) and also prevents the burn-off (heat cleaning) oven process burner from igniting for the first time in a cycle unless and until the afterburner (thermal oxidizer) reaches a minimum temperature of 1,400 °F.

Once the missing temperature logger was discovered, actions were immediately taken to obtain a quote, issue a purchase order, and schedule the work to have it installed. The Crown Group Shelby Plant showed the quote and purchase order for the temperature logger during the August 26, 2020 air inspection. After the inspection, updates throughout the purchase, delivery and installation process were sent to Mr. Joseph Forth, as the inspector, via email to keep him apprised.

The Crown Group Shelby Plant moved quickly to have the temperature logger delivered on September 4. The installation company reviewed the job scope on-site on September 9 and the installation of the temperature logger was completed on September 15, 2020. On September 17, 2020, a file was sent to Mr. Forth providing the temperature logs with temperature data at least every 15 minutes for over a dozen burn cycles in order to demonstrate project completion and compliance. Additionally, a task was entered in the EHS task management system for The Crown Group Shelby Plant for the semi-annual download of temperature logs to ensure the temperature logger records are retained for at least 5 years.

The Crown Group Shelby Plant believes that the corrective actions taken, as explained above, fully resolves the alleged violations as described in the Violation Notice dated September 28, 2020. Should you have any questions or require additional information, please contact Jason Nowak at your convenience at 248.408.8354 or jnowak@ppg.com.

Sincerely,



Matt Ulewicz
Plant Manager
The Crown Group Shelby Plant

Cc: Ms. Jenine Camilleri
Department of Environment, Great Lakes, and Energy
Air Quality Division – Enforcement Unit Supervisor
P.O. Box 30260
Lansing, MI 48909-7760