



February 21, 2024

Via E-mail and U.S. Mail

Mr. Mark Dziadosz
EGLE - Air Quality Division
Warren District Office
27700 Donald Court
Warren, MI 48092
DziadoszM@michigan.gov

Re: Tribar Technologies Plant 4 – Response to Violation Notice Dated January 31, 2024

Dear Mr. Dziadosz:

Tribar Technologies Inc. ("Tribar") has prepared this letter with assistance from Barr Engineering Co. to address the issues outlined in the January 31, 2024 Violation Notice ("VN") issued by the Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division ("AQD"). The VN alleges the following:

PTI 115-17B SC III.2 FGCHROME – The permittee shall not operate EUCHROME1 (Tank 50) unless chemical fume suppressant is applied in quantities and at a frequency to ensure the surface tension does not exceed 33 dynes/cm when measured using a tensiometer, at any time during tank operation. Tank 50 exceeded this limit multiple times as indicated by the company's record.

PTI 115-17B SC III.3 FGCHROME - The permittee shall not operate tank 5 or 6 in EUSYSTEM5 unless chemical fume suppressant is applied in quantities and at a frequency to ensure the surface tension does not exceed 33 dynes/cm, when measured using a tensiometer, or an acceptable surface tension as determined during testing, at any time during tank operation. Tank 5 & 6 exceeded this limit multiple times as indicated by the company's record.

At the outset, Tribar notes that Plant 4 operations were idled on December 2, 2023, and remain idled while the company considers its options going forward with the facility. Thus, there are no ongoing or continuing violations of any requirement in the PTI, including the surface tension requirements cited by the VN.

In terms of past operations, it is important to note that: (1) Tribar has scalable monitoring requirements in the PTI that allow for less-frequent readings based on certain circumstances; (2) Tribar generally sampled more frequently than what is required by the PTI; and (3) Tribar's records, including monitoring data for periods when the equipment was not operating, and therefore, the surface tension requirements cited in FGCHROME S.C. III.2 and III.3 were inapplicable. Each of these points is addressed further, below.

For the FGCHROME surface tension measurements of Tanks 5, 6, and 50, the Plant 4 facility satisfactorily monitors and records the surface tension multiple times every 40 hours. This is above and beyond the applicable requirement, which is once every 40 hours of operation after compliance is demonstrated according to PTI 115-17B SC VI.1. Specifically, PTI SC VI.1 requires the following scalable monitoring of surface tension:

The permittee shall monitor, in a satisfactory manner, the surface tension of tanks 5 and 6 in EUSYSTEM5 and Tank 50 in EUCHROME1 every once every four (4) hours during tank operation for the first 40 hours of tank operation. If there are no exceedances during the first 40 hours of tank operation, then surface tension measurements may be conducted once every eight (8) hours of tank operation for the next 40 hours of tank operation. If there are no exceedances during the 40 hours of tank operation when surface tension measurements are being conducted every eight (8) hours, then surface tension measurements may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every four hours must be resumed and the subsequent decrease in frequency shall follow the schedule as laid out above. The minimum frequency of monitoring allowed is once every 40 hours of tank operation.

In practice, and for the sake of simplicity, the surface tension readings at Plant 4 were performed multiple times per operating period, and approximately every 4 hours regardless of the longer periods allowed by S.C. VI.1.

As observed, the occasional surface tension reading did exceed 33 dynes/cm and, as noted, additional suppressant was then added to address this issue. According to the S.C. VI.1, operations then reverted to monitoring once every four hours for 40 hours of tank operation, and the subsequent decrease in frequency as defined in the PTI.

Please note, however, that measurements taken at startup—as noted in the submitted records—are taken to establish the amount of surface tension reducer to add prior to operational startup. Therefore, these values should not be evaluated for compliance because the tank is not in operation. Rather, the initial reading before operation was necessary to determine if and how much surface tension reducer to add before beginning operation.

Finally, as noted earlier, Plant 4 operations were idled on December 2, 2023.

Based upon the information provided, Tribar believes that it has responded to the alleged violations and that no further action is required. If you have questions or concerns, please feel free to reach out to me.

Sincerely,



Alexandria Muench, EHS Manager

cc:

Jenine Camilleri, EGLE
Joyce Zhu, EGLE
Teresa Kinder, Barr Engineering Co.