

March 1, 2023

EGLE, AQD Warren District Office 27700 Donald Court Warren, MI 48092

Re: Tribar Technologies Plant 5 – Response to Violation Notice Dated February 8, 2023

Dear Mr. Dziadosz:

Tribar Technologies Inc. (Tribar) has prepared this letter with assistance from Barr Engineering Co. to address the issues outlined in the Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division Violation Notice dated February 8, 2023. The violation notice (VN) alleges the following:

Process Description	Rule/Permit Condition Violated	Comments
EUSYSTEM2	SC VI. 2, 3, 4	Records of inspections and pressure drop readings on packed bed scrubber and composite mesh pad system were requested to be sent after inspection on July 21, 2022. As of February 8, 2023, the records have not been received.
EUCHROME5	SC VI. 2, 4	Records of inspections and pressure drop readings on composite mesh pad system were requested to be sent after inspection on July 21, 2022. As of February 8, 2023, the records have not been received.
FGSYSTEMS	SC VI. 1, 2	Daily records of the pressure drop readings for each scrubber system in FGSYSTEMS system were requested to be sent after inspection on July 21, 2022. As of February 8, 2023, the records have not been received.

Responses to these issues are addressed below.

According to former Tribar personnel, these records were compiled and sent to AQD after they were requested during the plant inspection on July 21, 2022. Tribar has attempted to locate these missing records since then to no avail.

The record issue was an isolated event and is not ongoing. Because monitoring and recording of the pressure drop readings is part of the ongoing plant maintenance preventative maintenance program. Pressure drop readings for composite mesh pad and scrubber systems are currently recorded by plant personnel and kept on file in accordance with PTI No. 121-16, which addresses the summary of the actions that have been taken, proposed to be taken, and steps being taken to prevent reoccurrence

If you have questions or require additional information, please feel free to reach out to me.

Sincerely,

Kevin P Bagby

Kevin Bagby, Tribar Technologies Inc. Chief Financial Officer

cc: Wayne Ferris, Director of OperationsAnnette Switzer, EGLE Christopher Ethridge, EGLE Brad Myott, EGLE Jenine Camilleri, EGLE Joyce Zhu, EGLE Teresa Kinder, Barr Engineering Co.