



To Whom it May Concern,

I'm writing in response to our violation notice from our last EGLE inspection that was conducted on August 23, 2023, by Daniel McGeen at our Owosso, MI location on 201 S. Delaney Rd. Below are the listed violations that were found during our inspection and my responses on how the violations will be addressed.

Violation #1- For 40 CFR Part 63, Subpart T, PTI 552-81C, EUDEGREASER, Special Condition 1.4 requires that the permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and T, as they apply to the degreaser. As identified during the inspection on August 23, 2023, not all provisions of Subpart T were met. Please see below for further details.

Indoor wind speed was not regularly measured by Allied Motion to determine and record reduced room draft for degreaser, in violation of Section 63.466(d) of Subpart T. It has been decided that this will not be implemented at this time for the listed below reasons.

- This has not been identified as a requirement during past inspections.
- We are currently working on eliminating our trichlorethylene degreasing process by the end of June 2024. If for some reason this process is not removed by then we will implement a wind speed monitoring device. The degreaser is currently only operating 2-3 times a month for only a few hours at a time.

Violation #2- From recordkeeping posted by the degreaser, the last date that the degreaser freeboard temperature was recorded appeared to be March 2, 2023, despite being operated as recently as July 2023, in violation of Section 63.466(a)(1) of Subpart T, which requires weekly recordkeeping.

- After discussing this with the operator, it was discovered that the records haven't been recorded on a weekly basis because we haven't been operating the degreaser on a weekly basis. Going forward the operator is going to start recording the freeboard temperature when the degreaser is operating, it is currently only operating 2-3 times a month.

Violation #3- Additionally, it was not confirmed, but it was believed that the degreaser does not have a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser. This is required by Section 63.463(a)(5) of Subpart T. Please verify if there is the required vapor level control device and include that and any corrective actions in your response to this letter.

- Our degreaser currently doesn't have a vapor level control device. The primary condenser is what keeps our vapor level controlled within the tank. If the primary condenser isn't working properly the degreaser will not allow us to turn it on to



operate the degreaser. It will also turn the degreaser off if it has a problem while operating.

Thank you for taking the time to review my responses in regard to the violations that were found during our last inspection on August 23, 2023. If there's any concerns or issues with the actions that are being taken in this letter, please contact me via phone or email as soon as possible so they can be properly addressed. My contact information is below.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Justin Bukovick', written over a light blue horizontal line.

Justin Bukovick
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