



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 9, 2022

VIA E-MAIL AND U.S. MAIL

Ryan O'Keefe, Environmental
Tribar, Plant 1
30517 Andersen Court
Wixom, MI 48393

SRN: N1581, Oakland County

Dear Ryan O'Keefe:

VIOLATION NOTICE

On July 21, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Tribar, Plant 1 located at 30517 Andersen Court, Wixom, Michigan. The purpose of this inspection was to determine Tribar's, Plant 1 compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 274-98A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-COATLINE	Emission Limits S.C. 1-11	Facility was not able to show compliance with the limits in PTI 274-98A.
FG-COATLINE	Material Usage Limit S.C. 12	Facility was not able to show compliance with the corresponding material limits in PTI 274-98A.
FG-COATLINE	S.C. 18	Facility has not provided records of the cure oven temperature, although the inspector was able to observe the temperature during inspection.
FG-COATLINE	S.C. 20 a and b	Facility did not have records of the amount used of HAPs-containing materials, HAP content, or records of individual and aggregate HAP emissions.
FG-COATLINE	S.C. 21 a-e	Facility was not able to provide records of daily hours of operation and for each coating, reducer, cleanup, or purge solvent; amount used, VOC content, a daily volume-weighted average, pounds VOC on daily average, or 12-month rolling VOC tons per month.

Mixing room cold cleaners	Rule 707 (3)(a)	Three small cold cleaners were uncovered without parts being handled in the paint mixing room.
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Be advised that failure to demonstrate compliance with the emission limits in the permit, Tribar's coating processes may be subjected to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products. These standards are found in 40 CFR Part 63, Subpart PPPP; and also, may be subject to the Renewable Operating Program (ROP) pursuant to Title V of the federal Clean Act and Michigan's Administrative Rules for Air Pollution Control promulgated under Section 5506 (1) of Act 451.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 30, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan, 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Tribar, Plant 1 believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Tribar, Plant 1. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Mark Dziadosz
Senior Environmental Quality Analyst
Air Quality Division
586-854-1611; dziadoszm@michigan.gov

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE