



GMI Composites Inc. +1 231 755 1611  
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Muskegon, MI 49441 gmi-composites.com

May 18, 2016

Ms. Kaitlyn DeVries - Environmental Quality Analyst  
Michigan DEQ/Air Quality Division  
State Office Building, 5th Floor  
350 Ottawa Avenue NW, Unit 10  
Grand Rapids, MI 49503-2341



Subject: Response to Violation Notice dated April 25, 2016 to GMI Composites, Inc.

Dear Ms. DeVries,

Within this letter, please find our response to the Violation Notice (dated April 25, 2016), resulting from the March 17, 2016 air quality inspection of GMI Composites, Inc. (GMI) located at 1355 West Sherman Boulevard, Muskegon, Michigan.

MDEQ has cited a violation of the material limit specified in Special Condition II.1 for EU-FILAMENT of Permit to Install #183-07C. Special Condition II.1 states, "The styrene content of any resin(s) used in EU-FILAMENT shall not exceed 34.0 percent by weight."

In response to the inspection, GMI supplied the MDEQ with the [Material] Safety Data Sheet (SDS) from Polynt Composites USA Inc. for the 787-0790 vinyl ester (revision date of April 3, 2015), showing a styrene concentration of 35.00%. After discussions with Polynt in order to find a suitable alternative which would be below 34.0% styrene material limit, it was discovered that the SDS was incorrect. Polynt sent us a Technical Data Sheet with the corrected styrene concentration of 31%. Please find the enclosed Technical Data Sheet (TDS) for 787-0790, dated April 2016. We trust the TDS will show us compliant with Permit to Install #183-07C.

We have also implemented an environmental review process of all new materials being brought into the facility. We expect this process will prevent any future occurrences of material limit violations.

Please contact me with any questions or concerns at (231) 536-4663 or [tony.pitts@ejco.com](mailto:tony.pitts@ejco.com).

Sincerely,

Tony A. Pitts  
Environmental Services Manager

Enclosure: Polynt Composite's Technical Data Sheet for 787-0790