



# Cul-Mac Industries, Inc.



March 14, 2016

CERTIFIED MAIL

Mr. Sam Amer  
Senior Environmental Engineer  
Air Quality Division  
Department of Environmental Quality  
Cadillac Place  
3058 West Grand Boulevard  
Suite 2-300  
Detroit, Michigan 48202-6058

RE: Violation Notice  
SNR: N5861, Wayne County  
Cul-Mac Industries, Inc.  
3720 Venoy Rd.  
Wayne, MI 48184

Dear Mr. Amer:

Cul-Mac Industries, Inc. (Cul-Mac) has received a Violation Notice (VN) letter, dated February 23, 2016, from the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), for the subject property referenced above. The letter referenced a site inspection by Mr. Amer on January 8, 2016, and states that "During this inspection, it was noted that Cul-Mac Industries, Inc. had installed and commenced operation of an unpermitted Methanol Storage Tank at the facility. The AQD staff advised Cul-Mac Industries, Inc. on January 19, 2016, that this was a violation of Act 451, Rule 201."

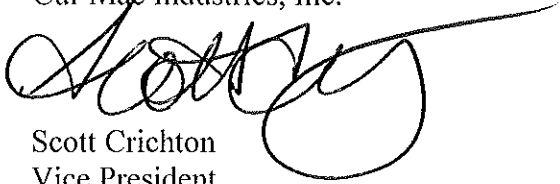
The AQD letter further stated that "A program for compliance may include a completed PTI (Permit to Install) application for the Methanol Storage Tank process equipment." Cul-Mac hereby proposes to complete the required PTI consistent with the requirements of R 336.1201(1) (Rule 201). In fact, once Cul-Mac became aware, that a PTI was required for the Methanol Storage Tank, on January 19, 2016, a Project Team was immediately put in place to timely complete the PTI. Progress to date includes the following:

- Mr. James Drain (Plant Manager: Cul-Mac) and Mr. Christopher Groff (Chemist/Regulatory Coordinator: Cul-Mac) attended, on February 2, 2016, the following MDEQ workshops: (1) Introduction to MAERS and (2) SARA Title III Tier Two.
- CUL-MAC retained NES & Associates, Inc. (Abdul S. Abdul, Ph.D., PHG, CP) to provide environmental services including responsibility for preparation of the PTI for the Methanol Tank.
- CUL-MAC retained HANDS & ASSOCIATES, INC. (Mr. Charles F. Barker, P.G.) to provide MAERS Consulting Services.

Cul-Mac is in the process of completing the PTI for the 100K gallons Methanol Tank. As the development of the PTI progresses, Dr. Abdul will call Mr. Amer to discuss the specific details of the PTI application to ascertain that the final submission will meet the requirements of R 336.1201(10 (Rule 201). The proposed date of completion of a PTI is April 15, 2016.

Mr. Amer, Cul-Mac appreciates your continued support, and if you will like to discuss our progress, we will be readily available.

Respectively submitted:  
Cul-Mac Industries, Inc.

A handwritten signature in black ink, appearing to read "Scott Crichton", with a large, stylized flourish extending to the right.

Scott Crichton  
Vice President