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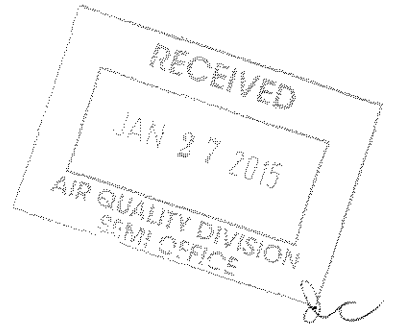
PHONE: 248-650-1330

FAX: 248-650-1334

Bob-ELI

January 20, 2015

Mr. Robert Elmouchi
Michigan Department of Environmental Quality (MDEQ)
27700 Donald Court
Warren, MI 48092-2793



**RE: Response to Violation Notice
Prefix Corporation (SRN P0204)
Rochester Hills, Michigan**

Dear Mr. Elmouchi:

Prefix Corporation (Prefix) is submitting this response to the Violation Notice (VN) that was issued to the facility on September 19, 2014 by the Michigan Department of Environmental Quality (MDEQ). The VN was issued due to the operation of three (3) unpermitted spray booths. The VN stated that on September 3, 2014 the MDEQ Air Quality Division (AQD) received records showing the total combined coating usage rate in all three (3) spray booths exceeded 200 gallons per month for several months. Since Prefix did not track the usage for each individual spray booth, the facility was not able to demonstrate that it was exempt from Michigan Rule 201 permitting requirements per Rule 287(c) which limits each coating line to 200 gallons per month. Additionally, Prefix had submitted a Rule 208a registration on May 5, 2011; however, as stated in the VN, the facility did not submit the required annual Rule 208a registration.

In response to the VN, Prefix is actively pursuing a compliance plan to remedy this matter as soon as possible. Prefix has retained NTH Consultants, Ltd. (NTH) to assist with correcting the cited violation by developing and air use Permit to Install (PTI). This PTI will include calculating potential emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) from the three (3) spray booths. Once potential emissions are determined, Prefix will either apply to obtain both a General PTI and HAP opt-out PTI, or apply to obtain a custom site-specific PTI limiting both VOC and HAP emissions below major source thresholds. It is anticipated that a General PTI and HAP opt-out PTI will suffice as Prefix is a small operation.

In addition, the MDEQ has recently rescinded Rule 208a, thus it is no longer applicable. As a result, the MDEQ has offered several options to facilities to show compliance with the Michigan



Air Pollution Control Rules. From these options, Prefix can obtain an opt-out PTI or demonstrate through their potential emissions that they are below the major source thresholds and are a true minor source.

If there are any questions, please do not hesitate to contact me at (248) 220-9821.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Tomaszewski", is written over a horizontal line. The signature is stylized and somewhat illegible.

Kraig Tomaszewski
Paint Shop Supervisor
kraig.tomaszewski@prefix.com

cc: Lori Myott, NTH Consultants, Ltd.
Rich Kraft, Prefix Corporation