

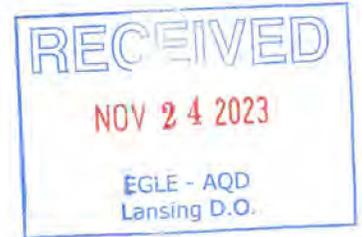


Flex|N|Gate Group
 Ventra Fowlerville, LLC
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INTERIOR & EXTERIOR PLASTICS
 BODY STRUCTURE & EXTERIOR
 METALS
 MECHANICAL ASSEMBLIES
 DESIGN & PROTOTYPING
 LIGHTING SYSTEMS
 SEQUENCING

21 November 2023

Michigan Department of Environmental, Great Lakes, and Energy
 Lansing District Office
 Air Quality Division
 525 W. Allegan St.
 Lansing, MI 48909



Attention: Mr. David Rauch, Environmental Quality Analyst

Re: Ventra Fowlerville, LLC
 Consent Order AQD No. 2019-22
 SRN: N7413, Livingston County
 ROP No. MI-ROP-N7413-2020

Dear Sirs:-

We write in response to your letter dated 1 November 2023, received by email on that date comprising a Violation Notice for permit condition ROP SC IV.3. R 336.1702(a) & R 336.1910.

By way of background, we mention that on 30 August 2023, we received a technical report from environmental health and safety consulting firm SevenGen (the "EHS Report") which concluded that, based on a 25 July 2023 industrial hygiene survey of our facility:

"... Full-shift formaldehyde concentrations ranged from <0.019 ppm to 0.11 ppm and were all below the MIOSHA AL of 0.5 ppm and the MIOSHA PEL of 0.75 ppm. One measurement, obtained on the Wastewater Treatment operator, exceeded the MIOSHA Formaldehyde Awareness Training Limit of 0.1 ppm and the ACGIH TLV of 0.1 ppm. All other measured chemical concentrations were below their respective MIOSHA PELs and ACGIH TLVs, as well as their respective MIOSHA ALs and MIOSHA STELs where applicable. ..."

(Italics Added)

In your letter, you advise that its operations were "... not capturing a minimum of 90% of the Volatile Organic Compounds being sprayed. ..." The basis for your advice was a letter published on 3 October 2023 reporting on the results of certain performance tests conducted on 9 and 10 August 2023, following Ventra Fowlerville's installation of a new RTO (the "October 2023 Report").

Promptly after receiving the October 2023 Report, Ventra Fowlerville LLC escalated the findings within the Flex|N|Gate Group (which operates numerous similar RTO systems), formed a dedicated investigation and problem-solving team comprised of competent and experienced individuals, and undertook the following actions:



Date	Actions Taken	Status
23 October 2023	Inspected and resealed all relevant paint booth entrances, windows, and ductwork.	Continuing
10 November 2023	Implemented system adjustments to achieve reduced downdraft flow in each spray zone.	Completed
10 November 2023	Implemented a closed loop control of the recirculation air houses (RASHs) static inlet pressure.	Completed
15 November 2023	Engaged specialist Sterling Industrial Services (SIS) to clean out blockage in supply troughs and flood sheets to improve downdraft pressure. Adopted a twice-annual preventive maintenance plan.	Completed
21 November 2023	Purchased a manometer to monitor the system pressure. This gage will confirm that the system maintains negative pressure continuously.	Completed

Further, Ventra Fowlerville will undertake the following actions:

Date	Future Actions Which will be Taken	Status
21 November 2023	Engage consultant <i>Impact Compliance & Testing</i> to attend the facility starting on 29 November 2023 to review improvement opportunities and assess alternative test methods.	In Process
4 December 2023	Implement a closed loop control of RTO fan inlet static pressure to maintain constant exhaust flow as system (RTO) resistance changes.	In Process
Q1 2024	Perform and furnish the results of a further capture efficiency test once the improvement actions above are implemented and once the review by <i>Impact Compliance & Testing</i> is completed.	In Process

Ventra Fowlerville has not determined the root cause for the test results. Inasmuch as our operations have not materially changed since the EHS Report, we remain of the view that while we work to address the non-compliance, Ventra Fowlerville's operations are not exposing any individuals or neighbors to harmful or unsafe odors or VOC levels. Should you have any questions or concerns regarding this information, please feel free to contact Evan Urbanski, EHS Manager, at (517) 304-8306.

Yours very truly,
 VENTRA FOWLERVILLE, LLC.

By: "George Stocks" /s/
 George Stocks
 General Manager