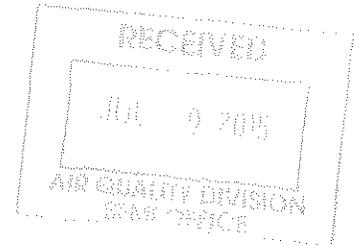


7/7/2015

**Department of Environmental Quality
Air Quality Division
27700 Donald Court
Warren, MI 48092
Attn.: Francisco S. Lim
Environmental Engineer**



Re.: Violation Notice for SRN # P0583, Ottobock Polyurethane Technologies, Inc.

Dear Mr. Lim:

Pursuant to your NOV letter dated June 17th, 2015, Ottobock Polyurethane Technologies, Inc. (PTI) would like to provide you with information regarding the Notice of Violation (NOV). As you are aware that PTI just recently received (actually after your visit) new air permit (PTI # 207-14) for FGPOLYFOAMs.

The way PTI and our chemical vendors calculated the limit for paint containing VOCs with limit of 5 lbs. /gallon minus water and other non-regulated VOCs apparently differ from DEQ calculations, which we found that later on through your visit. Consequently, PTI is currently working with DEQ Lansing Permit Department to modify the current permit to increase the VOCs limits to above 6.5 lbs. /gallon through Rule 702 (BACT).

PTI believes that the modified permit will be granted and the VOCs limits shall be increased to the proper limit (6.5 lbs. /gallon). PTI believes this should be completed within next 30 days, once the new modified permit is issued then we will inform you promptly. Please note due to the summer shut down, PTI production is way below normal and the quantity of paint being used is way below allowable limits.

PTI appreciates your full understanding of the unusual circumstance, which is normal when a new permit issued. Please contact me should you have any questions or require any additional information.

Sincerely,

Steve Foote,
Plant Manager

Ottobock Polyurethane Technologies, Inc.

Cc: Mohsen Kambod, ETC