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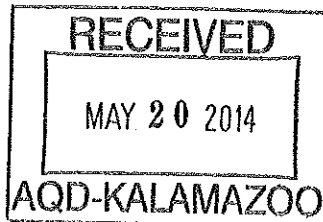
SUMMIT POLYMERS, INC.

Plant 05 - 6717 S. Sprinkle Road
Portage, MI 49002
(269) 324-9323

Molded & Decorated Plastic Systems -----

May 19, 2014

Dorothy Bohn
MI DEQ, ADQ, Kalamazoo DO
7953 Adobe Rd.
Kalamazoo, MI 49009



RE: Summit Polymers East Plant Air Permit No. 50-08.

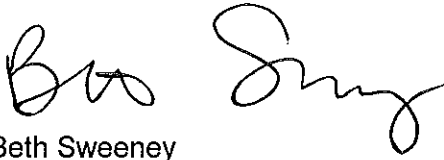
Dear Ms. Bohn,

This letter is in response to the violation notice letter sent to Summit Polymers East Plant on 4/29/14. The violations reported were exceeding the 2000 lb. per month permitted limit which occurred in July 2013 & August 2013 at EU PB001 (PB3) because of an increase in business. While we keep monthly records we did not realize we had exceeded the permitted amount until a cross plant audit with our sister plant performed in November 2013. We had been evaluating against the 30 tpy limit for all three of our paint booths combined which historically we have not come close to exceeding. We contacted Fishbeck, Thompson, Carr & Huber in December 2013 to help us apply for a new permit. While working with FTCH over the past few months we have had some obstacles to work thru including the 5 lb. VOC gallon limit. In April 2014 we exceeded our rolling 12-month 10 tpy limit at PB3, both of our other booths are well below the permitted level. It is projected that we will continue to exceed the 10 tpy limit at PB3 due to the rolling 12 month total because of the July 2013 and August 2013 overages until August 2014 when those months drop off. However we are taking the following actions to correct the violation and prevent a reoccurrence:

- On 4/30/2014 we ran trials with a water based paint to replace the black carbon metallic, our highest VOC contributor. We are leaning on our supplier to help us with all of the testing required to replace the solvent paint with this water based paint. We hope to be able to switch to water based within the next 3-4 months. When we do, we estimate an annual VOC output reduction of 6000-8000 pounds.
- Effective 5/2/2014 we have combined the painting process of 2 parts so that they are painted together. This will reduce our overall paint usage thereby reducing our VOC output by 3,121 lbs per year.
- On 5/10/2014 we trialed a non-VOC reducer blend (50% Acetone, 50% Tert Butyl Acetate). We liked the performance so we are moving towards permanently implementing this solvent which is planned to be complete 6/15/2014. Once implemented this will reduce the VOC use by approximately 3000 lbs per year.
- On 5/14/14 we applied for a new permit requesting an increase to 14 tpy based on new business and product launches. This will help prevent future occurrences.

If you have any questions, please call (269) 324-9323 ext. 206.

Sincerely,

A handwritten signature in black ink, appearing to read "Beth Sweeney". The signature is written in a cursive, flowing style.

Beth Sweeney
Human Resources Manager
Summit Polymers, Inc.
PLANT FIVE