

January 10, 2018  
Ms. Julie Brunner, P.E.  
Senior Environmental Engineer  
Air Quality Division  
Michigan Department of Environmental Quality  
P.O. Box 30260  
525 West Allegan Street  
Lansing, MI 48909

RE: Violation Notice – SRN: N5587, Shiawassee County

Dear Ms. Brunner:

I am writing to you in response to your letter dated December 20, 2017. This letter was written to inform Woodard-CM that a violation of our air permit, No 270-95B, was committed. The violation was noted as exceeding the special condition in the permit (40 CFR60, Subpart EE, less than 1,015 gallons of coating used on a 12-month rolling time period). This violation occurred as the result of our changing our permit to the special condition noted above. The condition was changed from the condition in No 270-95A from 7.5 pounds per gallon of coating solids applied, on a monthly weighted average volume. We felt we could not maintain this standard. This was the first 12-month rolling time period under permit No 270-95B. The violation will most likely continue until the following changes are made.

1. We will apply for our permit to change back to the PTI No 270-95A version. This application will be submitted by January 24, 2018.
2. We are currently working with our paint and thinner suppliers to determine if an alternative thinner can be used in our antique paints that do not contain any VOC's. This will be determined by February 1, 2018. If this can be achieved, we will be able to meet the requirements of 7.5 pounds per gallon of coating solids as applied on a monthly basis.

3. If we are unable to find an alternative thinner that contains no VOC, we will eliminate spraying antique paint onto our product. This method was determined to only have a .25 transfer efficiency. This was causing the pounds per gallon to exceed the 7.5 limitation. The antique paints that were being sprayed would be changed to a hand-dipped method (as we do with our other antique paints), which has a transfer efficiency of .95. This change would occur immediately upon making the determination as stated in item # 2.

Please let me know if this information is sufficient to prove that the noted violation will cease, and Woodard – CM, LLC will return to compliance status. If you have any questions, please call me at 989-725-4410.

Sincerely,  
Woodard-CM



Tony Minarik  
Industrial Engineer

AJM

CC: Mr. Louis Zelenka – V.P./General Manager, Woodard-CM  
Mr. Steven Inhulsen – Production Manager, Woodard-CM  
Mr. Reed Stauffer – Director of Engineering, Woodard-CM  
Ms. Teresa Gribi, DEQ