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May 30, 2017

State of Michigan
Department of Environmental Quality
Kalamazoo District Office
Attn: Ms. Mary Douglas, AQD District Supervisor
7953 Adobe Road
Kalamazoo, MI 49009-5025

VIA USPS PRIORITY MAIL



Re: Violation Notice dated May 10, 2017
Response to Rule/Permit Condition Violated: Special Condition 5.1 of PTI No. 93-13
SRN: P0448, Cass County

Dear Ms. Douglas:

This letter is in response to the above Violation Notice referring to "No Method 24 testing was completed on any adhesive, coating, or cleaning solvent." As requested, we provide the following information for your consideration.

Dates the violation occurred: The violation existed at the inspection date and continues currently.

Explanation of the causes and duration of the violation: The Company relied upon outside consulting to direct and report the testing and sampling of the VOC content, water content and density of the coatings, purge and clean-up solvent. Rather than use Reference Test Method 24, the Company used the manufacturers' formulation data for testing and sampling purposes despite not having received prior approval from the AQD District Supervisor to use such data.

Whether the violation is ongoing: The violation continues currently.

Summary of the actions and completion dates proposed to be taken to correct the violation: By May 31, 2017, the Company will request approval from the Kalamazoo District Office AQD District Supervisor to determine the VOC content, water content and density of the coatings, purge and clean-up solvent used in our operation under Permit to Install 93-13 using manufacturers' formulation data. Our request will ask to make the Supervisor's approval retroactive to September 5, 2013, the Permit Issuance Date, with continuing approval subsequent to the date hereof, or to provide us with the additional information needed so this Violation Notice may be waived.

Steps to be taken to prevent a reoccurrence of this violation: By July 7, 2017, the Company will review its activities related to PTI 93-13 and consider whether to engage different consulting resources to ensure this violation does not recur.

As noted in the activity report for AQD's April 6, 2017 Inspection, the Company's emission levels are well below the permit levels. We use well-known products from large suppliers such as PPG in the permitted operation that are regularly tested and verified by the manufacturers, making the manufacturers' formulation data accurate and reliable. The relative difficulty in complying with Reference Method 24 would be significant considering the Company has no certified chemists or engineers on staff and that accurate and reliable manufacturers' formulation data exists. As a result, we hope these factors will be considered in reviewing the adequacy and propriety of our responses above.

If there are any matters that require elaboration or clarification, please let me know. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan Fehnel". The signature is written in a cursive style with a large initial "B".

Bryan Fehnel
General Manager