

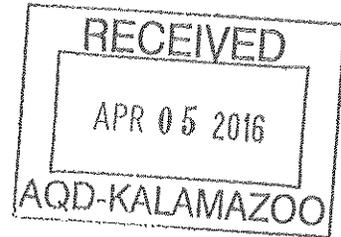


SUMMIT POLYMERS, INC.  
Plant 05 – 6717 S. Sprinkle Road  
Portage, MI 49002  
(269) 324-9323

Molded & Decorated Plastic Systems -----

April 4, 2016

Ms Monica Brothers  
Environmental Quality Analyst  
Air Quality Division  
269-567-3552



Dear Ms Brothers,

This letter is in response to the Violation Notice received by Summit Polymers Inc. dated March 17, 2016. The violation noted is Volatile Organic Compound emissions in excess of the 2000 lb/month limit which is a condition of PTI 142-15.

Dates of violation:

- 2000 lb/month VOC limit exceedance occurred in the months November 2015 – February 2016.
- 2000 lb/month VOC limit will be exceeded in March 2016.
- Plans in place to eliminate exceedance for April 2016 and beyond – described in Summary below

Causes of violation:

- New product launch in November 2015 – “Nissan Lid C” adding paint usage to Summit Polymers Plant 5 under paint booth covered by PTI 142-15.
- The Nissan Lid C requires two colors of paint, applied in separate applications, including a “masking” operation for the second color.
- The actual paint required to successfully paint the Nissan Lid C significantly exceeded the predicted paint quantity required due to the necessary painting technique and high scrap levels.

Summary of actions taken to correct violation:

- Implemented January 2016 – changed solvent reducer blend to eliminate non-exempt solvents, implemented new reducer blend containing 100% exempt solvents (acetone & t-butyl acetate) which reduced total VOC content of the dominant paint by approximately 19% as sprayed.

- Implemented January 2016 – corrected VOC reporting methods to separate “coating spray emissions” from “paint purge and cleanup” (non-emission) usage in VOC reporting methods – improving emission reporting accuracy to the effect of 6.6% reduction in emissions. Purge number accurately reflects the liquid waste transported by a licensed waste hauler to a permitted waste treatment facility.
- In process March and April 2016 – develop alternate paint source plan (Summit Polymers Plant 6 in Mt Sterling Kentucky) to move the Lid C base coat operation and eliminate resulting emissions at Plant 5. Target effective date April 6, 2016 to begin paint at Mt Sterling and target to stop base coat painting at Plant 5 on April 8, 2016. This action will bring Plant 5 in compliance with permit PTI No 142-15.

Summary of actions taken to prevent reoccurrence of violation:

- March 18, 2016 – Summit Polymers Plant 5, through FTC&H submitted an application to MDEQ to modify and consolidate Plant 5 permits similar to recent permits approved for other Summit Polymers facilities. Application includes revisions to VOC and exempt limits that would enable return of the “Nissan Lid C” base coat operations to Plant 5.
- March 2016 – Incorporate a procedure to evaluate the impact of VOC emissions based on actual paint trials a minimum of six months prior to the launch of a new program to validate that there will be no permit violations.

Sincerely,



Dan Brown  
General Manager  
Summit Polymers, Inc.  
Plant 5

Cc: Mr Greg Goodman, SPI  
Mr Dennis Bateman SPI  
Ms Amanda Crux SPI