

May 24th, 2018

Via Certified Mail: 70122210000077095087

Dear Ms. DeVries:

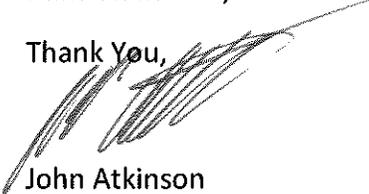
This letter is in response to the Violation Notice, issued May 8, 2018, to Ventra Ionia Main, LLC (SRN N0923).

The elevated surface tension readings were recorded on January 23, 2018, and February 7, 2018. Our records indicate that in both instances, after fume suppressant additions, the elevated readings returned to normal in less than 2 hours from initial discovery. This issue was not ongoing. We believe that any potential adverse impacts to the environment were controlled through the use of the air scrubber system that services the affected tank.

Upon discovery, fume suppressant was immediately added to drop the surface tension below 33 dynes. After the February 7th incident, further root cause investigation revealed a malfunction in the fume suppressant feed system. The malfunction was repaired immediately. On March 2, 2018, we implemented a procedure to guide our response in the event of future incidents. Please reference the attached "Procedure for Rechecking out of Specification Decorative Chrome Surface Tension." This procedure includes notification to key plant personnel, as well as establishing a formal protocol to increase the monitoring frequency of the affected tank's surface tension in accordance with 40CFR Part 63, Subpart N.

We have contracted a consultant to perform potential to emit calculations for particulate matter (PM), volatile organic compounds (VOC), and hazardous air pollutants (HAPS), as requested. The estimated time frame for completion is 6-8 weeks. Please feel free to contact Mike Sladewski, Environmental Manager, with any questions or concerns.

Thank You,



John Atkinson
General Manager
Ventra Ionia