

AXIUM GROUP

Date : 11/22/14

Mr. Dennis Dunlap
State of Michigan DEQ
7953 Adobe Rd.
Kalamazoo, MI 49009

Re: Violation Notice - A0703, Cass County



E-MAILED

11/25/14

Dear Mr. Dunlap,

As you are aware we have been working with you to get approval on revised formulations for our stains. On 11/3/14 you approved the last stain color and we started full implementation of the revised formulas.

The confusion on this violation occurred when we applied for construction of 2 additional booths to add to the existing operation. During this process we supplied data on certain, currently being used stain bases, that had lower limits than other stain bases currently being used (every color we use has a slightly different VOC, HAPS and / or toxic makeup). We should have used our worst case scenario like we did in the original permit. Please understand we have never changed the coating system we are using since the original permit, we simply supplied information on a stain base during the last permit modification process that happened to be a color with lower limits.

Because of this oversight, the modified permit has limits that not all our original stain colors fall under. I had a hard time understanding the violation because in my mind we asked for a permit to add two booths, we never changed or modified the coatings from the original permit. When we final realized the issue, and investigated what had been submitted for the modified permit approval, it made sense that some of the colors did not now meet compliance under the new permit.

We have now utilized a different stain base to bring the stain colors that did not meet the new thresh hold into play. This was not an intentional situation, and we thought what we had permitted for allowed us to do, and use, what we always had done on the coatings side of the equation. The new process will totally in place 11/26/14.

Please call if you have any questions

Jeff Schwartz
Axium Group, LLC