

Molly Dwinells, CHMM
Environmental
Coordinator

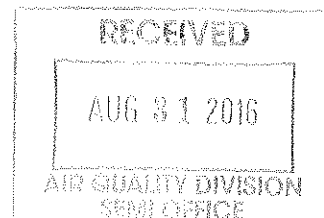
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August 30, 2016

Mr. Rem Pinga
MDEQ – AQD
27700 Donald Court
Warren, MI 48092-2793



RE: Axalta Coating Systems, Mt Clemens Plant – SRN A3569 – Response to
Violation Notice dated Aug. 11, 2016

Dear Mr. Pinga,

On August 3, 2016 Axalta reported a deviation of its Renewable Operating Permit (ROP) No. MI ROP-A3569-2011d via an electronic communication (e-mail).

Date of Occurrence(s): June 30, 2016

Group ID: EU-WBSB

Condition: Material Limit Condition 1 page 47 of 79; limit 21,250
gallons per month

Background Information:

EU-WBSB (waterborne small batch) encompasses small (150-500 gallon) batch manufacturing of water based OEM paint products. Intermediates and solvents, mainly water, are blended in vessels to make OEM paint products. VOC emissions from this unit are very low, typically less than 50 lbs. per month. This emission unit has a material produced limit of 21,250 gallons per month. The production for the month of June was 23,003 gallons which exceeded the material limit by 1753 gallons. The average 2016 production for this area is approximately 16,000 gallons per month. No emission limitations were exceeded.

The combination of the following unusual circumstances caused the production limit exceedance:

- a) The area was to be shut-down for maintenance and normal production batches were shifted ahead slightly to ensure product availability during shut down; and

- b) There was a previously unplanned increase in customer demand for the WBSB product at the same time.

Immediate Corrective Actions

A meeting was held on July 22, 2016 with the EU-WBSB management group including: planners, engineering managers, area engineers, area operations supervisors, area operations and data collection specialists to ensure that the team was aware of the issue and to reiterate the permit requirements for the area.

On-going Corrective Actions

The operations manager, with assistance from planning and the environmental group, are using a supply chain production schedule to forecast and track planned production in EU-WBSB in order to maintain compliance with current permit production limits. A production forecast is made at least twice per month.

Additionally, actual production for the area is being carefully monitored on an on-going basis by the operations group to ensure that production limitations are met.

Future Corrective Actions

Future production needs and formulations for the area are currently being evaluated and an action plan is being developed.

All production limitations are currently being met.

If you have any questions concerning this submittal I can be reached at Office: (586) 307-9937 or Cell: (586) 395-8993.

Sincerely,



Molly Dwinnells, CHMM
Axalta Coating Systems, LLC
Environmental Coordinator
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CC:

Mr. Joseph Campbell, Axalta Coating Systems
Ms. Denise Trabbic-Pointer, Axalta Coating Systems