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September 23, 2017

Mr. Jonathan Lamb  
Senior Environmental Quality Analyst  
Michigan Department of Environmental Quality  
3058 West Grand Boulevard  
Suite 2-300  
Detroit, Michigan 48202

Dear Mr. Lamb,

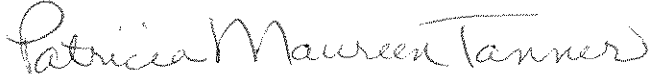
Materials Processing Inc (MPI) is submitting this letter as continued follow up regarding the Violation Notice received on August 3, 2017. As you are aware, MPI submitted correspondence dated August 31, 2017 with a preliminary plan of action which included utilization of Michigan Air Pollution Control Rule (MAPCR) 336.1290 as well as obtaining an Opt-Out Permit. However, after further conversation with you, as well as discussion with an outside consultant, MPI is prepared to present an amended proposed course of action to resolve the alleged violations.

In accordance with the Violation Notice, enclosed is a Table which details the alleged violation, as well as MPI's proposed corrective action and a summary of timing for response. In summary, for deficiencies noted in recordkeeping, MPI has already acted to correct the deficiency. For items specific to equipment installation or emissions, MPI is planning to re-evaluate onsite processes and process equipment, as we do not believe that our current permit to install (PTI) allows us the operational flexibility needed to meet our business demands. MPI can meet the required annual emission limits for volatile organic compounds (VOC), however, the coating constituent limitations and short term emission limits impede MPI from meeting customer requirements. For example, one of our products is manufactured for government use and mandates the use of a coating with specific parameters. The restrictive limits within the original permits did not (and could not) account for such a customer demand when originally issued over twenty years ago. Therefore, the result of our analysis will be to submit an

application for a PTI modification which accurately characterizes the operating scenarios at the facility while meeting appropriate air quality permit limitations.

Please let me know if you have any further questions regarding this matter.

Sincerely,

A handwritten signature in cursive script that reads "Patricia Maureen Tanner".

Patricia Maureen Tanner  
Human Resources Director

c: J. Calnen, GZA  
T. Martinovski, MPI

Enclosure

### Materials Processing, Inc. – Violation Notice Summary Response Table

Observation	Cause and Duration	Action Taken/Proposed and Timeline
<p>Facility installed two natural gas fired curing ovens on Line 1 without obtaining a Permit to Install</p>	<p>The natural gas ovens have been in place for over 20 years at MPI and there is not adequate historical documentation to indicate what actions were taken to evaluate the need for an air use permit.</p>	<p>MPI will be working with an outside consultant to evaluate onsite processes and process equipment and will subsequently request an amended PTI which, if appropriate, will address the natural gas curing ovens.</p> <p>MPI will submit an amended PTI Application to the MDEQ-AQD by December 31, 2017.</p>
<p>VOC emission rates for Line 1, in pounds per gallon, 24-hour averaging period, were not calculated as required.</p>	<p>A misunderstanding in the calculation methods caused this item to be overlooked. It appears the oversight continued throughout 2017, but has since been corrected.</p>	<p>MPI has corrected the recordkeeping spreadsheet to calculate the emission rate on a 24-hour averaging period, as required.</p>
<p>VOC emission rate of 16.25 pounds per hour on August 2, 2016, exceeded the permit limit of 4.2 pounds per hour, daily average, based on operating hours.</p>	<p>MPI reviewed the record and concluded that although the limit was exceeded, due to a typographical error in the calculation the VOC emission rate was 5.42 pounds per hour, not 16.25 pounds per hour. MPI also acknowledges that the original Wayne County permit issued in 1993 no longer reflects current operating scenarios at the facility. The duration of the exceedance is limited to a single occurrence on August 2, 2016.</p>	<p>MPI is working to evaluate onsite processes and process equipment and will subsequently request an amended PTI which will propose emission limitations that reflect current operating practices.</p> <p>MPI will submit an amended PTI Application to the MDEQ-AQD by December 31, 2017.</p>
<p>The VOC content of several coatings used on Line 2 exceeded the permit limits of 0.14 pounds VOC per gallon (minus water) and 0.30 pounds VOC per gallons (minus water).</p>	<p>MPI processes have changed since issuance of the original Wayne County permit in 1994 to accommodate customer quality requirements. It should be noted that while the coating VOC content did not meet the specific permit parameters there was not an air emission exceedance. VOC emissions from Line 2 remain within the allowable permit limit of 3.64 tons per year.</p> <p>Based on a review of coating records it is not clear when the coatings currently in use on Line 2 were introduced at the facility, however it appears to have occurred prior to the beginning of 2017.</p>	<p>MPI is working to evaluate onsite processes and process equipment and will subsequently request an amended PTI which will propose emission limitations that reflect current operating practices and allow for operational flexibility to meet customer demands.</p> <p>MPI will submit an amended PTI Application to the MDEQ-AQD by December 31, 2017.</p>

**Materials Processing, Inc. – Violation Notice Summary Response Table**

Observation	Cause and Duration	Action Taken/Proposed and Timeline
<p>The VOC content of several coatings used on Line 3 exceeded the permit limit of 0.24 pounds VOC per gallon.</p>	<p>MPI processes have changed since issuance of the original permit in 2006 in order to accommodate customer quality requirements. It should be noted that while the coating VOC content did not meet the specific permit parameters there was not an air emission exceedance. VOC emissions from Line 3 remain within the allowable permit limit of 10 tons per year.</p> <p>Based on a review of coating records it is not clear when the coatings currently in use on Line were introduced at the facility, however it appears to have occurred prior to the beginning of 2017.</p>	<p>MPI is working to evaluate onsite processes and process equipment and will subsequently request an amended PTI which will propose emission limitations that reflect current operating practices and allow for operational flexibility to meet customer demands.</p> <p>MPI will submit an amended PTI Application to the MDEQ-AQD by December 31, 2017.</p>
<p>The VOC emission rate on Batch Booth 1 exceeded the permit limit of 1.41 pounds per hour, based on a monthly average, nine times between January 2016 and March 2017.</p>	<p>MPI processes have changed since issuance of the original permit in 1997 in order to accommodate customer quality requirements. It should be noted that while the short-term VOC emission limit did not meet the specific permit parameters at intermittent intervals the facility did not exceed the allowable permit limit of 3 tons per year.</p> <p>The duration of the exceedance is limited to the nine events identified within the Violation Notice.</p>	<p>MPI is working to evaluate onsite processes and process equipment and will subsequently request an amended PTI which will propose emission limitations that reflect current operating practices and allow for operational flexibility to meet customer demands.</p> <p>MPI will submit an amended PTI Application to the MDEQ-AQD by December 31, 2017.</p>