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July 5, 2016

Michigan Department of Environmental Quality
Air Quality Division
Cadillac Place
3058 W Grand Blvd suite 2-300
Detroit, MI 48202-8058

Subject: Violation Notice Response Letter
The Crown Group Detroit Lynch Road Plant
General PTI No. 46-04
6334 Lynch Road Detroit Michigan

Mr. Jonathan Lamb;

In accordance with the Violation Notice dated May 27, 2016, The Crown Group Lynch Road facility is providing the below details regarding the discovery and follow-up actions related to the VOC emission exceedances.

In early 2016, The Crown Group received an updated value for paint VOC content (lb/gal) from Fortech, the supplier of the water based paint used at the Lynch road facility. This new value equated to roughly eight (8) times that of the number previously supplied. Fortech noted that the paint formula had not changed, and that the latest number was the result of more accurate VOC calculations.

Upon receipt of the updated VOC number, The Crown Group requested that the number be verified, which indeed it was noted that the number was accurate. The updated VOC content value, when used in emission calculations, put The Crown Group over the monthly limit for the following months, through the end of May 2016: Sept '15, Oct '15, Feb '16, Mar '16, Apr '16, and May '16. The 12-month limit was also exceeded, monthly, starting in April.

Exceedances are due to both the revised value for VOC content, and, to significant increases in production starting in March 2015.

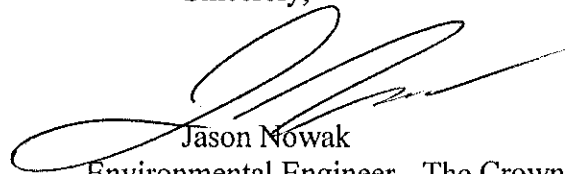
A paint-reduction initiative was started at the facility to reduce usage and ultimately, emissions, from the facility. Electric eyes, sensing style and shape of incoming axles, at the entrance to the paint booths were repaired, and programming was changed on the robotic sprayers to reduce overspray during operation. Program repairs and upgrades are still underway to the electrostatic elements of the paint process to improve spray efficiency.

As a result of the violations, The Crown Group submitted a PTI for a new air permit for the facility in April 2016. The application was revoked until additional information can be obtained, including current paint usages after implementation of facility improvements mentioned above. The Crown Group anticipates submitting a revised and completed PTI at the end of August, 2016.

Both the monthly and 12-month rolling limits are expected to be exceeded until the issuance of a new permit with higher emission limits.

I believe that this complies with the requirements to close out the February 26, 2016 Notice of Violation. Should you have any questions or require additional information, please contact me at your convenience at 586.558.5340 or jnowak@thecrowngrp.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Nowak', with a long horizontal flourish extending to the right.

Jason Nowak
Environmental Engineer - The Crown Group