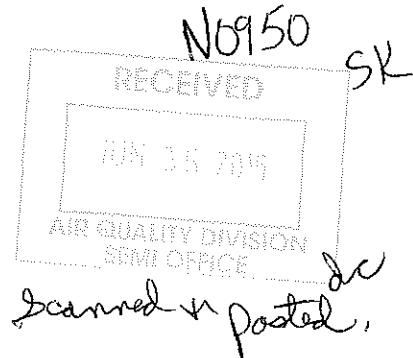


MICHIGAN
METAL COATINGS
COMPANY

2015 Dove Street
Port Huron, MI 48060

Telephone: 810.966.9240
Facsimile: 810.966.9242

June 22, 2015



Sebastian Kallumkal
Senior Environmental Engineer
Air Quality Division
Southeast Michigan District Office

Dear Mr Kallumkal,

I have received the violation notice and investigated the cause of the violation. I believe there were errors in MMC's calculation of the gallons used for the VOC calculations. These errors in gallons used if transferred to the HAP calculations give the wrong HAP's totals resulting in the violation in individual HAP's for Methanol.

Due to the VOC calculations being compiled on a daily weighted average by coating line we have utilized the pound of parts coated each day which is tracked by the Production Department. Then based on the estimated pounds of parts per gallon of coating we calculate the gallons used each day. I have purposely been conservative in the ratio of pounds of parts coated per gallon of coating which resulted in stating more gallons were used on each line than actual. I did this because our VOC facility limit is 50 tons per year and we utilize only half of this limit and I thought it would be better to over calculate the VOC's rather than under calculate the VOC's.

The HAP's calculation sheet only requires the recording to be on a monthly basis so MMC utilized the monthly inventory usage numbers to populate the HAP's sheet. These coating usage totals are accurate for the month as we perform an actual measurement of gallons remaining at the end of the month in all tanks and drums for each coating at the facility. Therefore, the original HAP's sheet I sent has the correct gallons of usage based on actual inventory usage.

I am taking the actual gallons used per year of each coating applied for the last two years and Year to Date for 2015 and the actual pounds of parts processed to get a more accurate pounds per gallon for each coating. I will then use the averaged pounds per gallon to calculate the gallons used per line per day. I will periodically compare the monthly gallons used in the VOC calculation sheet to the actual inventory gallons used for each coating applied. I will update the VOC calculations for 2014 and 2015 reflecting the new average pounds per gallon.

I do not believe MMC is required to apply for a Renewable Operating Permit as the Haps totals have not been exceeded based on the actual gallons used as first reported by MMC.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lentz", with a long horizontal flourish extending to the right.

Michael Lentz
Quality Assurance Manager
Michigan Metal Coatings Company