

In response to PTI No. 84-05A, SC 3.3 and SC 3.4 violations as stated in the violation notice dated September 21, 2021 please read the following explanation.

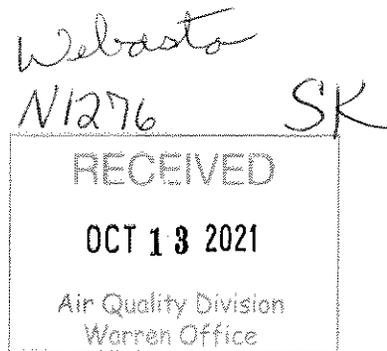
It appears as if our spread sheet was corrupt, or the calculations had been changed. It is unknown when or why this happened.

From this point forward, the spreadsheet will be reviewed by the HSE engineer and the HSE Management Lead (newly created position) annually to make sure there have been no changes and all calculations are correct.

This extra step should eliminate any future problems like we found with the form this year.

Thank you,

Bradley Lawrence
HSE Engineer
Webasto Roofing Systems
2700 Product Drive
Rochester Hills MI 48309
Cell: 248-270-6506



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In response to PTI No. 84-05A, SC VI.1 and VI.3 violations as stated in the violation notice dated September 21, 2021 please read the following explanation.

This explanation and solution will be the same as SC 3.3 and SC 3.4.

It appears as if our spread sheet was corrupt, or the calculations had been changed. It is unknown when or why this happened.

From this point forward, the spreadsheet will be reviewed by the HSE engineer and the HSE Management Lead (newly created position) annually to make sure there have been no changes and all calculations are correct.

This extra step should eliminate any future problems like we found with the form this year.

Thank you,

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In response to PTI No. 84-05A, SC VII.1 and R336.1201 violations as stated in the violation notice dated September 21, 2021 please read the following explanation.

Per discussions with the few people that were here at the time (2018) it was thought that because we were removing equipment and replacing it with these 5 presses' that another permit was not going to be required. That thought was based on the fact that the equipment in that area had been operating under permit 84-05 and that would suffice.

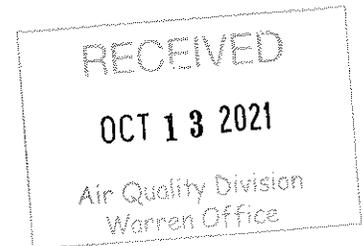
When a HSE Engineer was hired it was realized that a permit to install should have been done prior to the installation. Rather than ignore it, they chose transparency and submitted a request for a Permit to Install at that time.

In the Summer of 2021, there was a change in structure of the HSE (Health, Safety, and Environment) department that has added additional expertise. Whereas the initial structure had all the HSE engineers reporting to the North American Director of HSE, we now have a layer between the Director and the HSE engineers that allows for much more direction and time available for guidance and training.

Since the time of adding the position of "HSE Management Systems Lead", there is much better communication, and we are confident that many of the errors made in the past will not be repeated going forward.

Thank you,

Bradley Lawrence
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In response to PTI No. 84-05A, R336.1290 violation as stated in the violation notice dated September 21, 2021 please read the following explanation.

This was fully my fault. I discovered that they changed chemicals and the new one did not emit VOC's.

I removed them from the report for that reason. I now know that I should have identified the new chemical and reported it as no VOC's instead of removing them.

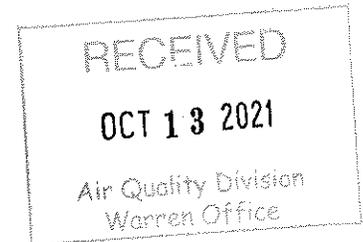
It was a learning process for me. This process of the MEARS report and your audit of us has given me a much better idea of what the State is looking for and how to present the data.

This mistake will not be repeated as I now have experience with the reports. I will review all reports with the "HSE Management Lead" for approval before any future submissions.

As a side note to this, we dismantled the G4/G5 lines in the spring of 2021 and next year's submission will be the last for these lines.

Thank you,

Bradley Lawrence
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In response to PTI No. 84-05A, R336.1201 violation as stated in the violation notice dated September 21, 2021 please read the following explanation.

This violation goes back to the fact that our spread sheet was either corrupted or changed, when and how has not been determined.

The spread sheet has been changed to the correct calculations and will be reviewed annually and before submission with our HSE Management Systems Lead" before submittal.

These changes will correct the problem with our submittal for the Sealants in Final Assembly.

As far as the use of cleaning solvents, the alcohol was reported, and the calculations have been corrected. The other cleaners will be either Windex, or Coastwide Professional Glass Cleaner which do not emit VOC's, so we did not report it.

As noted in the other responses, the spread sheets will be reviewed annually, and prior to any submissions from now on to verify that the calculations are being reported correctly.

Thank you,

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