

# HIGHWOOD DIE & ENGINEERING

1353 HIGHWOOD ROAD · PONTIAC, MI 48340 · (248) 338-1807 · FAX: (248) 338-2184

June 22, 2015

Mr. Remilando Pinga  
Senior Environmental Engineer  
Michigan Department of Environmental Quality  
Air Quality Division  
Southeast Michigan District  
27700 Donald Court  
Warren, Michigan 48092-2793



Subject: Response to June 4, 2015 Letter of Violation

Dear Mr. Pinga:

This letter responds to the Violation Notice (dated June 4, 2015) addressed to TTX Company Draco Division (TTX) and Highwood Die & Engineering (Highwood) from the Air Quality Division (AQD) of Michigan's Department of Environmental Quality. The Notice indicated violations of Permit No. 13-13 in terms of exceeding the VOC emission limitations of Permit No. 13-13 as well as failure to keep records of rolling total HAP emission rates at the facility located at 5225 Williams Lake Road in Waterford Township, Michigan. The Notice asked for a report of Highwood's program for compliance, which is set forth below in further detail.

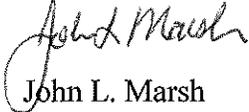
Highwood exceeded the VOC emission limitations due to a misunderstanding of the requirements of Permit No. 13-13. As you are aware, because Highwood has exceeded the VOC emission rate exemption limitations of Michigan Rule 621(10)(a), Highwood is now required to comply with the provisions of Rule 621. Consequently, consistent with the provisions of Rule 621(1)(b), Highwood immediately ceased the use of coatings with greater than three and one-half pounds of volatile organic compounds emitted per gallon of coating, minus water. In addition, as summarized by the attached table, Highwood is currently in compliance with the VOC emission limitations of Permit No. 13-13 as well as the HAP recordkeeping provisions of Permit No. 13-13.

To additionally ensure that Highwood will not exceed the VOC emission limitations of Permit No. 13-13, Highwood has applied for a modification to Permit No. 13-13 to eliminate the monthly VOC emission limitation and to increase the annual VOC emission limitation.

6/22/2015

TTX and Highwood are dedicated to conducting operations in an environmentally-responsible manner and are working diligently to address the issues identified in your letter as expeditiously as possible. If you have any questions regarding the enclosed documents or Highwood's operations, please call me at (248) 338-1807.

Sincerely,

A handwritten signature in cursive script that reads "John L. Marsh".

John L. Marsh  
Director of Operations