

*Emerald
Graphics
Part*

April Lazzaro
Air Quality Division
350 Ottawa Ave. NW Unit 10
Grand Rapids, MI 49503



Dear April

Per your inspection on January 19, 2017, the following Permit Violations were noted.

General PTI#401-08 Special condition VI.3.d&e, PTI#401-08 Special condition VI.1 and Opt-out # 91-12 Special condition VI.2.d&e.

Per our phone conversation, both PTI#401-08 Special condition VI.3.d&e and PTI#401-08 Special condition VI.1 were directly related to the non-reporting of the 95% Isopropyl Alcohol / 5% DI Water pre-saturated wipers. Although monthly records are kept on the purchase/usage of these wipers, there was an oversight in adding them to the VOC Tracker. This has been amended, and the usages have been added to our tracking system for previous, as well as current usage.

The Opt-out PTI # 91-12; Special Condition VI.2.d&e was related to the HAPS emission records. It was noted that there was double counting of the mix ratio for VOC's that are HAPS in the spreadsheets, which is not an accurate statement. The VOCs are correct and there is a clerical error on the HAPS.

I would like to address and clear up the confusion on the products noted in your letter.

In our effort to be proactive and input the VOC's "As Applied" which is more accurate in lieu of the theoretical value, we compiled the spreadsheet for our formulations, which takes in account the ratio of the actual solvent and raw material mixed. We review these mixes periodically to see if there is a variance, as sometimes it will take more, or less solvent to get to the desired viscosity. The Chrome Shadow has had a couple of changes to the VOC value due to this. What we have done for reporting, is create a new product with the new value and apply it to the reporting after the point of change. We keep the old value, but make the product with that value inactive so that it does not affect the data to which it was applied. This makes the revised data applicable to the data from that change forward and keeps the old value applied to the prior data period. Therefore, there may be different VOC values for the same product, but they are applied and accounted for on the monthly and annual reports as they were applied.

Again, we are trying to maintain the best estimate accuracy as an alternative to theoretical information.

There was a clerical error found on the monthly HAPS report. When a new product is input to the tracking system, the percentage of each HAP is calculated in pounds per gallon per the percentage of raw material in the mix. We found in the monthly report, that the calculation was again being made, therefore underestimating the HAP. This has been corrected in our report generator. With this

correction being made to our report, please note that we are 98% below our allowable emission of HAPS.

In summary, we have added the Alcohol/DI Water wipes to our VOC reporting for both current and previous use.

Corrected the double calculation of the HAPS on the applicable reports.

Sincerely,

A handwritten signature in cursive script that reads "Brian Dillon".

Brian Dillon

Paint Manager

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