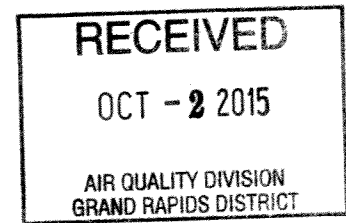




September 10, 2015

Ms. Kaitlyn DeVries  
MDEQ-AQD, Grand Rapids District Office  
State Office Building, 6<sup>th</sup> Floor  
350 Ottawa Avenue, NW, Unit #10  
Grand Rapids, Michigan 49503-2341



Re: Response to Violation Notice  
Plasan Carbon Composites (SRN: P0374)

Dear Ms. DeVries:

This letter is in response to the Violation Notice letter, dated September 4, 2015, that was received by Plasan Carbon Composites. The violation notice asserts the following five (5) violations.

1. The company exceeded an individual Hazardous Air Pollutant (HAP) limit of 9.0 tpy (PTI 130-12, FG-FACILITY, S.C. I.1).
2. The company exceeded an individual Hazardous Air Pollutant (HAP) limit of 9.9 tpy (PTI 130-12A, FG-FACILITY, S.C. I.1)
3. The company failed to maintain an average cure oven temperature below 194 °F maximum limit (PTI 130-12A, FG-PAINT, S.C. III.4)
4. The company failed to maintain a device to monitor the cure oven temperature on a continuous basis (PTI 130-12A, FG-PAINT, S.C. IV.3)
5. The company failed to submit a timely initial notification for an affected source (40 CFR Part 63, Subpart PPPP).

As discussed in our initial notification meeting with the MDEQ-AQD on July 10, 2015 and later confirmed in a meeting with the MDEQ-AQD at Plasan on July 30, 2015, the facility exceeded the individual HAP limitation of 9.0 tpy on March 18, 2015. At the time of the exceedance, the company was in the process of increasing the individual and aggregate HAP limitations to major source levels with a permit modification application that was not approved until April 21, 2015.

With the exceedance on March 18, 2015, the MDEQ-AQD declared the source to be a major source of HAPs subject to the Plastic Parts Coating NESHAP (40 CFR Part 63, Subpart PPPP). Since the facility had already exceeded the individual HAP limit of 9.0 tpy and declared a major source of HAPs, effective March 18, 2015, it is our assertion that the individual and aggregate HAP limitations listed in PTI #130-12A, issued on April 21, 2015, were null and void at the time of the permit issuance.

Plasan Carbon Composites is in the process of assembling a permit modification application which will formally request to have the individual and aggregate HAP limits removed from the permit-to-install. Once this permit application has been approved by the MDEQ-AQD, Plasan Carbon Composites will include the new Permit-to-install in an initial Title V permit application under the Renewable Operating Permit (ROP) program. As noted in your letter, dated September 4, 2015, an administratively complete ROP application is due by March 18, 2016.

Each of the previous permit-to-install applications for Plasan Carbon Composites has asserted that the coatings to be used will be 2-component coatings that will be cured as air dried coatings.

However, Plasan Carbon Composites has had difficulty in curing the 2-component paint at temperatures below 194 °F. Therefore, a higher temperature has been used.

The permit-to-install modification application, currently being assembled, the company will seek to allow for both high bake and air dried coatings to be applied to the carbon composite parts. The company is also propose coatings that will have "as applied" VOC contents that will comply with both high bake and air dried coatings limits, making the cure oven temperature an unnecessary condition.

On the date of the MDEQ-AQD inspection, it was discovered that the thermocouple measuring the cure oven temperature had become loose from its fixture and therefore not fully inserted into the oven. This situation was corrected on the date of the site visit (July 30, 2015). Therefore, we believe this violation has been addressed. It should be noted, that while the thermocouple had come loose, the instrument was still recording the temperature of the oven on a continuous basis. We therefore take exception to the statement that we failed to maintain a device to monitor the cure oven temperature on a continuous basis.

On August 4, 2015, Plasan Carbon Composites submitted an Initial Notification of Applicability for the Plastic Parts Coating NESHAP, Subpart PPPP. Part of the delay in submitting the notification was due to the time required in determining the exact date of startup (the HAP exceedance date), which is required as part of the notification. During the month of March, our permit (PTI #130-12) required that we only maintain monthly usage and emission data. Therefore the exact date of exceedance wasn't fully determined until July 30, 2015 and the notification was filed on August 4, 2015.

We believe that this response letter is timely, to the violation notice request and addresses the outstanding issues. Should you have any questions, please feel free to contact me at (616) 965-3423.

Sincerely,  
PLASAN CARBON COMPOSITES



Brenda Wisniewski  
Environmental Health and Safety Manager

cc Ms. Heidi Hollenbach, MDEQ-AQD  
Ms. Lynn Fiedler, MDEQ-AQD  
Ms. Teresa Seidel, MDEQ-AQD  
Mr. Thomas Hess, MDEQ-AQD  
Mr. Gary Peters, Howard & Howard