



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT  
DIRECTOR

June 17, 2015

Mr. Steve Foote, Plant Manager  
Otto Bock Polyurethane Technologies, Inc.  
2923 Technology Drive  
Rochester Hills, Michigan 48309

SRN: P0583, Oakland County

Dear Mr. Foote:

**VIOLATION NOTICE**

On June 3, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Otto Bock Polyurethane Technologies, Inc. ("Otto Bock") located at 2923 Technology Drive, Rochester Hills, Michigan. The purpose of this inspection was to determine Otto Bock's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and the conditions of Permit to Install (PTI) No. 207-14.

During the review of the coatings used at Otto Bock, a violation was identified as follows:

Process Description/Equipment	Rule/Permit Condition Violated	Comments
EUPOLY 4 and EUPOLY8	Special Condition II.1, Permit to Install No. 207-14	VOC content of coatings exceeded the permit limit.
EUPOLY7	Special Condition II.1, Permit to install No. 207-14	VOC content of coatings exceeded the permit limit.

Special Condition No. II.1 of Permit to Install No. 207-14 specifies a coating VOC content limit of 5.0 lbs. VOC/gallon (minus water), as applied. The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. For F953 coating, AQD calculated a VOC content of 6.3 lbs. VOC/gallon, minus water; for F988, 6.5 lbs. VOC/gallon, minus water.

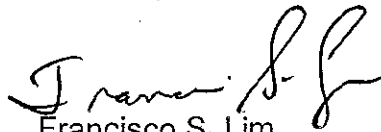
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 8, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are

proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Otto Bock believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Francisco S. Lim  
Environmental Engineer  
Air Quality Division  
586-753-3742

FL/DC

cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Ethridge, DEQ