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VIA CERTIFIED MAIL

April 28, 2016

Ms. Katie Koster
 Senior Environmental Engineer
 State of Michigan
 DEQ – Air Quality Division
 Cadillac Place
 3058 West Grand Blvd, Suite 2-300
 Detroit MI 48202-6058

RE: Response to the violations found during the inspection on March 17, 2016

Dear Ms. Koster,

Please accept this letter as Watson Engineering, Inc.'s response to the violations listed below and as noted in the attached Violation Notice, dated April 14, 2016:

Process Description	Rule/Permit Condition Violated	Comments
EUBURNOFF	PTI 174-06, EUBURNOFF, Special Condition 1.10	The device used to continuously monitor the temperature of the afterburner was not operated and maintained in a satisfactory manner. The 24 hour temperature chart was not replaced on a regular basis.
	PTI 174-06, EUBURNOFF, Special Condition 1.11	Yearly calibration records of the thermocouples were not available.
	PTI 174-06, EUBURNOFF, Special Condition 1.12	The 24 hour temperature chart was not replaced on a regular basis.
	PTI 174-06, EUBURNOFF, Special Condition 1.15	Records of the date and duration of each burnoff cycle, coating type removed during each cycle, and daily, monthly, and 12 month calendar year totals of hours of operation were not available.

1. **PTI 174-06 EUBURNOFF, Special condition 1.10** - The device used to continuously monitor the temperature of the after burner was not operated and maintained in a satisfactory manner. The 24 hour temperature chart was not replaced on a regular basis.

Dates of Violation: March 17, 2016

Reason for failure: The designated employee in charge of this process left the company and the replacement employee lacked the knowledge of this rule.

Corrective action: The device to record the afterburner temperature will be calibrated, maintained and operated in a satisfactory manner and the afterburner temperature shall be recorded at least once every 15 minutes. Charts will be replaced and dated after each operation of the burn off process. Files will then be stored in our maintenance/safety record department. Training will be documented and personnel assigned to this process will have trained backup.

2. **PT1 174-06 EUBURNOFF, Special condition 1.11** - Yearly calibration records of the thermocouples were not available.

Dates of Violation: March 17, 2016

Reason for failure: The designated employee in charge of this process left the company and the replacement employee lacked the knowledge of this rule.

Corrective action: Thermocouples were calibrated after the inspection and we have now set up a schedule with an outside firm on a yearly basis to come in and inspect the unit. All records will be kept in the maintenance/safety record department. Personnel assigned to this process will have trained backup.

3. **PTI 174-06 EUBURNOFF, Special condition 1.12** - The 24 hour temperature chart was not replaced on a regular basis.

Dates of Violation: March 17, 2016

Reason for failure: The designated employee in charge of this process left the company and the replacement employee lacked the knowledge of this rule.

Corrective action: Chart will be changed after each operation dated and filed in the maintenance /safety record dept. Personnel assigned to this process will have trained backup.

4. **PTI 174-06 EUBURNOFF, Special condition 1.15** - Records of the date and duration of each burnoff cycle, coating type removed during each cycle and daily, monthly and 12 month calendar year totals of hours of operation were not available.

Dates of Violation: March 17, 2016

Reason for failure: The designated employee in charge of this process left the company and the replacement employee lacked the knowledge of this rule.

Corrective action: Burnoff log chart has been created to document hours of operation along with date and what was burned off. Charts will now be stored with the temperature chart readings in the maintenance/safety record department. Monthly audits will be performed to monitor the data to prevent over usage of hours. Personnel assigned to this process will have trained backup.

Watson Engineering is committed to complying with all applicable rules and regulations, including providing a safe and clean work environment. We feel the above violations have been corrected to your department's level of expectations. If you have any questions, please feel free to contact me.

Sincerely,



Richard Parzuchowski
Assistant Plant Manager