



5050 Kendrick St. SE
Grand Rapids, MI 49512
April 24, 2019



Mr. David Morgan, Environmental Quality Specialist
DEQ, Air Quality Division
350 Ottawa Ave. NW, Unit 10
Grand Rapids, MI 49503

Copy to:

Ms. Jenine Camilleri, Enforcement Unit Supervisor
DEQ, Air Quality Division
PO Box 30260
Lansing, MI 48909-7760

*****CERTIFIED LETTER*****

Reference: Violation Notice dated 4/12/2019

Dear Mr. Morgan:

This letter is in response to the Violation Notice, dated April 12, 2019, which followed a visit to the site on March 14, 2019. Below I have outlined the corrective actions taken for each violation with copies and screen shots of the materials developed at the site to insure compliance.

The Violation:

"The company did not conduct semi-annual verification of the direction of air flow at each natural draft opening of the non-fugitive enclosure."

Yanfeng Response: Yanfeng team created a Test Plan and Program to address the violation with the assistance of an Environmental Consultant. The Smoke Test Program consists of an Excel Workbook with five Tabs that each assist with a portion of the Smoke Test activity. They are: Procedure, Test Report, Paintline NDO Map, Corrective Action and Letter. Then was a PM set up in our PM system to generate a reminder on the prescribed schedule dates of Smoke Testing for the Supervisor and for the Supervisor's backup. (The Excel Workbook pages are included after the salutation in this letter)

The Violation:

"The company does not have regenerative thermal oxidizer temperature records for 2018."

Yanfeng Response: Paint Department Staff underestimated the amount of data that a temperature reading taken every second was going to take up on an SD Card, therefore, when the data was requested, the card was full of data but did

not include any of the 2018 data. The corrective action taken in this matter was to change the timing of the data gathering to once every 15 minutes, which will reduce the amount of data collected. The company also created some procedures around the data gathering SD cards which includes routine checking of the SD card capacity, maintaining a supply of SD cards on hand in the Paint Department and, a process to retain the original SD card after each download as back up. A reminder for this activity was also set up in the PM System which will automatically send out the request to the assigned responsible person.

These actions should address the concerns of the individual violations. Assuming the Smoke Test Plan is adequate for the task, we will set a date for the site testing and notify you of that date, should you like to attend. If you need additional information about the Actions described in this letter, feel free to contact me.

Regards,

A handwritten signature in black ink, appearing to read "Colleen J. Bowden". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Colleen J. Bowden
Environmental, Health and Safety Manager
Yanfeng Automotive Interiors
231-301-3231

Cc: Jennifer Ritsema
Howie Frederick