

First to Finish with Quality

A&K Finishing, Inc. ISO 9001: 2008 Registered

4436 Donker Court, S.E.
P.O. Box 888159
Grand Rapids, MI 49588-8159
Phone 616-949-9100
Fax 616-949-2901
Email ak@akfinishing.com
www.akfinishing.com

June 25, 2014

Mr. David L. Morgan MDEQ – Air Quality Division Grand Rapids District Office 350 Ottawa, NW – Unit 10 Grand Rapids, MI 49503-2341



re: 4436 Donker Court (SRN N5155) Violation Notice

Dear Mr. Morgan,

A&K Finishing, Inc. is in receipt of your Violation Notice of June 6th alleging a violation of Permit to Install (PTI) No. 21-07B special condition number 1.4 for exceeding the VOC content limit on numerous occasions from July 2013 to April 2014.

You have requested that actions be initiated to correct the alleged violations and also have requested a written response by July 27, 2014. You have indicated that the written response should include the dates that the violations occurred, an explanation of the cause 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 that dates by which these actions will take place, and what steps are being taken to prevent a reoccurrence.

As you know, the business climate, particularly in the automotive sector, has had its challenges in the past few years. A&K Finishing experienced a downturn during this period. As a result, we were forced to redouble our sales efforts and have new employees in these positions. These efforts have recently become successful with the addition of new work and associated coatings. The current situation arose due to the lack of a formal Rule 632 review process to ensure compliance. We have now developed such a procedure to ensure compliance moving forward. A copy of this procedure is attached. Training of this procedure will be given to our sales and production employees on a priority basis but no later than July 18th.

Actions we have taken to resolve this issue include recently amending PTI #21-07B to exempt Line #4 from Rule 632 Table 66 limits. Also, many of our customers require that our coating processes be certified for quality purposes. For the past several months, we have been certifying Line #4 and Line #6 (Rule 632 exempt lines) in order to use Rule 632 non-compliant coatings on these lines. We have just completed the recertification process for Lines #4 and Line #6 and are happy to report that we are now in full compliance with the limits in Rule 632.



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Please let me know if you have any questions and thank you for your time and cooperation in this matter.

Sincerely,

Scott Hankamp Operations Manager

cc: Ms. Heidi Hollenbachp