



February 12, 2024

Iranna Konanahalli
Senior Environmental Engineer
Department of Environment, Great Lakes, and Energy
2700 Donald Court
Warren MI, 48092

Subject: Response to Non-Compliance Notice

Dear Iranna Konanahalli,

FlexNGate, Southfield, acknowledges receipt of your letter dated 01-31-2024, highlighting our non-compliance regarding the failure to maintain satisfactory records for temperature monitoring of our RTO. We want to emphasize FlexNGate's commitment to self-policing, transparent disclosure, and prompt correction of this violation. Understanding the crucial importance of adhering to regulatory standards, we have swiftly implemented corrective measures.

We are currently conducting a thorough review and improvement to our internal processes to guarantee the consistent and accurate maintenance of temperature monitoring records for the RTO. Attached, you will find documents demonstrating the updated and current RTO temperature monitoring chart. Furthermore, we have incorporated a weekly check into our PFC process start-up and shutdown checklist to prevent similar issues in the future. We are also closely considering the implementation of electronic temperature logging in the near future as we believe it to be a viable option.

We appreciate your diligence in bringing this matter to our attention and assure you of our dedicated efforts to promptly resolve the issues. FlexNGate remains steadfast in its commitment to the highest standards of compliance and pledges to maintain full cooperation with the state regulatory requirements. If there are any further requirements or information needed, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Carl Hawkins".

Carl Hawkins

General Manager FlexNGate

(248) 376-5137



PFC PROCESS STARTUP/SHUTDOWN CHECKLIST

	DATE:	COMPLETED BY:
START-UP		
<input type="checkbox"/> Turn on air compressor (warning: this step must be completed before continuing)		
<input type="checkbox"/> Visually verify that all intakes and exhausts are running in all paint booths		
<input type="checkbox"/> Verify all ovens are at temperature		
<input type="checkbox"/> Verify that air dryer is on		
<input type="checkbox"/> Verify that the system is in the "Auto Mode" by viewing yellow indicator		
<input type="checkbox"/> Verify RTO System is on (PLC) <input type="checkbox"/> Verify AMU and rash units are on (PLC)		
<input type="checkbox"/> Check / Clean ALL Pump IN-Line Filters Weekly (Mondays) INITIALS _____		
Replace Temp Chart Recorders Weekly (Mondays) <input type="checkbox"/> Prime Oven <input type="checkbox"/> Final Cure Oven <input type="checkbox"/> RTO INITIALS _____		
Wash System (PLC): <input type="checkbox"/> Stage 1 Header Pump on/off <input type="checkbox"/> Stage 2 Header Pump on/off <input type="checkbox"/> Stage 3 Header Pump on/off <input type="checkbox"/> Stage 4 Header Pump on/off <input type="checkbox"/> Exhaust fan 1 on/off <input type="checkbox"/> Exhaust fan 2 on/off <input type="checkbox"/> Blower on/off Wash System (MANUAL): <input type="checkbox"/> Stage 1 Soap Pump Set to "AUTO" <input type="checkbox"/> R.O. water supply line turned to ON <input type="checkbox"/> Rinse Aid Pump turned ON Heat: <input type="checkbox"/> Burner Start <input type="checkbox"/> Set point: Dry – Off: <input type="checkbox"/> Exhaust fan 1 on/off <input type="checkbox"/> Exhaust fan 2 on/off <input type="checkbox"/> Recirc. blower on/off <input type="checkbox"/> De-Stat on (manual) Heat: <input type="checkbox"/> Set point: <input type="checkbox"/> Burner on/off Booth #1 <input type="checkbox"/> Temperature: <input type="checkbox"/> Exhaust blower on/off Booth #2 <input type="checkbox"/> Temperature: <input type="checkbox"/> Exhaust blower on/off	Prime Oven: <input type="checkbox"/> Exhaust blower on/off <input type="checkbox"/> Recirc. blower on/off <input type="checkbox"/> VFD for Prime oven cooldown ON (manual) <input type="checkbox"/> Prime exit De-Stat ON (manual) Burner: <input type="checkbox"/> Burner on/off <input type="checkbox"/> Set point: Booth #3/4: <input type="checkbox"/> Temperature <input type="checkbox"/> Exhaust blower on/off Booth #5: <input type="checkbox"/> Temperature: <input type="checkbox"/> Exhaust blower on/off Booth #6: <input type="checkbox"/> Temperature: <input type="checkbox"/> Exhaust blower on/off Quiet Zone: <input type="checkbox"/> Exhaust blower on/off Cure Zone 1: <input type="checkbox"/> Recirc. blower on/off <input type="checkbox"/> Exhaust blower on/off Heat: <input type="checkbox"/> Set point: <input type="checkbox"/> Burner on/off	Cure Zone 2: <input type="checkbox"/> Recirc. blower on/off <input type="checkbox"/> Exhaust blower on/off Heat: <input type="checkbox"/> Set point: <input type="checkbox"/> Burner on/off Cure Zone 3: <input type="checkbox"/> Recirc. blower on/off <input type="checkbox"/> Exhaust blower on/off Heat: <input type="checkbox"/> Set point: <input type="checkbox"/> Burner on/off Robots: <input type="checkbox"/> Robot #1A in use <input type="checkbox"/> Robot #1B in use <input type="checkbox"/> Robot #2 in use <input type="checkbox"/> Robot #3A in use <input type="checkbox"/> Robot #4A in use <input type="checkbox"/> Robot #5 in use <input type="checkbox"/> Robot #6A in use P-Mix (if in use): <input type="checkbox"/> Confirm on the P-Mix unit Catalyst ratio set for Robots 1A/1B <input type="checkbox"/> Confirm on the P-Mix unit Catalyst ratio set for Robot 2 Final Verification & Temperatures: <input type="checkbox"/> Wash Set-up Complete <input type="checkbox"/> Robot Set-up Sheets Complete <input type="checkbox"/> Verify all boxes right of location is green for all ovens that should be "ON".

SHUTDOWN		
	COMPLETED BY:	
<input type="checkbox"/> Paint System OFF (completed P.L.C. AUTO SHUTDOWN)		
Wash System (MANUAL): <input type="checkbox"/> Stage 1 Soap Pump Set to "OFF" <input type="checkbox"/> R.O. water supply line turned OFF <input type="checkbox"/> Rinse Aid Pump turned OFF	Dry – Off: <input type="checkbox"/> De-Stat OFF (manual)	Prime Oven: <input type="checkbox"/> VFD for Prime oven cooldown OFF (manual) <input type="checkbox"/> Prime exit de-stat OFF (manual)

COMMENTS:

NOTE: Each item must be verified or completed and the associated box checked as verification.
Reaction Plan for any out of spec condition: Notify Plant/Operations Manager to initiate Abnormal Event process.
 Reference XCQAWI.00010 PFC Line PLC Operator for detailed instructions.

