

# A&C ELECTRIC / Lincoln Service LLC

41225 IRWIN

HARRISON TOWNSHIP, MI 48045

586-469-0710

[www.acelectriccompany.com](http://www.acelectriccompany.com)

November 2, 2018

State of Michigan  
Department Of Environmental Quality, AQD  
S.E. MI District  
27700 Donald Court  
Warren, MI 48092

Attention – Ms. Kerry Kelly  
Re – SRN: N6908, Macomb County

As per our conversations and your notification/recommendations regarding the referenced Violation Notice at our facility, please consider following response and advise if further action is necessary.

In response to the Rule 201 Violation

1. The dates the violation occurred: Since the tank was put into use (1990 prox.).
2. Cause and duration of the violation: We did not realize that we either had to comply with a permitting exemption or get a permit for the varnish tank / oven.
3. Is the violation ongoing: The violation is not ongoing. We hired an engineer to come in and determine the amount of varnish we are using in the unit. This was based on purchase records for the most part. Based on this, we have determined that we use much less than 200 gallons per month (currently less than 10 gallons). Going forward, we will be complying with the exemption from 201 permitting by appropriately using the Rule 287(2)(c) permit exemption.
4. Summary of the actions taken: In order to comply with the exemption from permitting, we have incorporated record keeping procedure at the tank of actual additions of varnish to the tank. We plan to assume that any varnish added equals varnish used for the month. We will ensure that we stay under 200 gallons and if we get close to the limit, we will apply for a permit. We will keep the records of usage for at least 2 years.

Hopefully, this response and these procedural / record-keeping changes will fulfill the DEQ, AQD inquiry and VN to your satisfaction. We have been communicating with and advised by Ms. Jenifer Dixon (DEQ Compliance Assistance Office) who has been very prompt and helpful in this matter. If you have any further questions, or if I can be of further service, please message or call.

Best Regards,

A handwritten signature in black ink, appearing to read "Daniel Arker", with a long horizontal stroke extending to the right.

Daniel Arker  
General Manager  
A&C Electric Company/ Lincoln Service LLC

Cc: Ms. Jenine Camilleri  
DEQ, AQD  
PO Box 30260  
Lansing, MI 48909-7760