



Associated Rack Corporation

1125 Morren Ct.  
Wayland, MI 49348  
616-554-6004



March 20, 2020

Mr. Cody Yazzie  
STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY  
Kalamazoo District Office  
7953 Adobe Road  
Kalamazoo, MI 49009-5025

**re: American Rack Company (SRN P0893)  
Violation Notice of March 11<sup>th</sup>**

Dear Mr. Yazzie,

American Rack Company is in receipt of your Violation Notice of March 11<sup>th</sup> alleging a violation of Permit-to-Install (PTI) No. 151-12. Specifically, the alleged violations are:

*EU-DIPCOAT Special Condition VI.4 American Rack is required to perform and maintain daily records of visible emission readings on EU-DIPCOAT. At the time of the inspection staff was informed that the facility was not conducting or maintaining record of the daily visible emission readings.*

*EU-DIPCOAT Special Condition VI.5 - The facility is required to continuously monitor the temperature of the thermal oxidizer associated with EU-DIPCOAT. The facility is also required to maintain record of the thermal oxidizer while EU-DIPCOAT is in operation at least once every 15 minutes. During the inspection Staff was shown records of the initial records when the thermal oxidizer was started up, however records were not maintained and recorded every 15 minutes as required by the permit.*

You have requested that actions be initiated to correct the alleged violations and have also requested a written response by April 1, 2020. 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 recurrence.

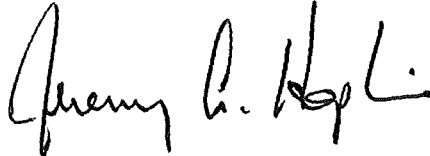
With regards to the daily records of visible emission readings on EU-DIPCOAT, we are now conducting these non-certified observations at least once each operating day. We have been performing these observations soon after your inspection on November 12<sup>th</sup>, 2019 and have

continued performing them ever since. Attached is an example of the records we are maintaining. Please let us know if this type of record keeping is not acceptable.

With regards to the recording of the thermal oxidizer temperature every 15 minutes, we do not have a continuous temperature recorder and are now manually recording the temperature of the dipcoat afterburner every 15 minutes. Attached is an example of the records we are maintaining. Please let us know if this type of record keeping is not acceptable.

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

Sincerely,

A handwritten signature in black ink that reads "Jeremy A. Hopkins". The signature is written in a cursive style with a large initial 'J' and 'H'.

Jeremy Hopkins  
Plant Manager

Weekly Temperature  
Coating Oven 1425  
Degrees

Date: 2/10-2/14

Time	Monday	Tuesday	Wednesday	Thursday	Friday
6:00 AM					
6:15 AM					
7:00 AM					
7:15 AM		X	X		
7:30 AM	✓	X	X	✓	
8:00 AM	✓	X	X	✓	✓
8:15 AM	✓	X	X	✓	✓
8:30 AM	✓	X	X	✓	✓
8:45 AM	✓	X	X	✓	✓
9:00 AM	✓	X	X	✓	✓
9:15 PM	✓	X	X	✓	✓
9:30 AM	✓	X	X	✓	✓
10:00 AM	✓	X	X	✓	✓
10:15 AM	✓	X	X	✓	✓
10:30 AM	✓	X	X	✓	✓
10:45 AM	✓	X	X	✓	✓
11:00 AM	✓	X	X	✓	✓
11:30 AM	✓	X	X	✓	✓
11:45 AM	✓	X	X	✓	✓
12:00 PM	✓	X	X	✓	✓
12:15 PM	✓	X	X	✓	✓
12:30 PM	✓	X	X	✓	✓
12:45 PM	✓	X	X	✓	✓
1:00 PM	✓			✓	✓
1:15 PM					✓
1:30 PM					✓
1:45 PM					✓
2:00 PM					✓

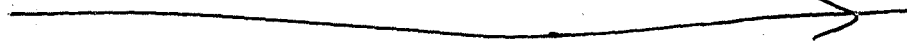
# February 2020

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
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1 2

3 4 5 6 7 8 9

REBUILD



10 11 12 13 14 15 16

NIU

JAN

JAN

JAN

JAN

17 18 19 20 21 22 23

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JAN

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NIU

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24 25 26 27 28 29

JAN

NIU

JAN

JAN

NIU

BURNOFF OVEN  
VISUAL CHECK

NIU = NOT IN USE