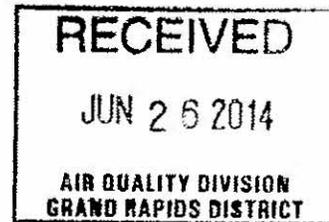




A&K Finishing, Inc.
ISO 9001: 2008 Registered

4436 Donker Court, S.E.
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Grand Rapids, MI 49588-8159
Phone 616-949-9100
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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: 4175 Danvers Court (SRN N2585) 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. 264-04 special conditions number 1.1f and 1.1g 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.

We had also anticipated that additional new coatings would soon be used at the facility that would reduce average daily VOC emissions to below the limits in Rule 632 Table 66. Unfortunately, the use of these new coatings has been delayed.

We currently operate under PTI #264-04 which has a 12-month rolling VOC emission limit of 87.9 tons. Our current 12-month rolling VOC emissions are less than 3 tons. In fact, the highest level of emissions in the last 14 years was 10.59 tons in 2007. We



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believe we can operate under R 336.1632(15)(a) for a stationary source that has a total combined emission rate of volatile organic compounds from plastic coating lines of less than 30 tons per calendar year. We plan on applying for an amendment to PTI #264-04 to limit facility wide plastic parts coating emissions to less than 30 tons to eliminate the requirement to comply with the limits in Rule 632 Table 66.

We are immediately beginning the preparation of an amendment application to PTI #264-04 and anticipate having the application submitted by July 18th but no later than August 1st.

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 Hollenbach