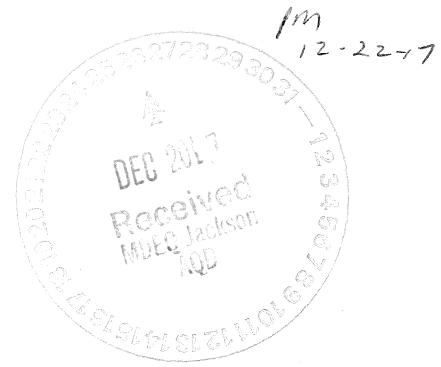




1319 S. Elm Street
Jackson, Michigan 49203
(517) 782-8161 FAX (517) 782-7758



December 22, 2017

Mr. Mike Kovalchick
Environmental Engineer
MDEQ-Air Quality Division
State Office Building
301 E. Louis B Glick Hwy.
Jackson, MI 49201-1556

Subject: Violation Notice, Elm Plating Co. 1319 South Elm Street, Jackson, MI 49203, SRN: N3209

Dear Mr. Kovalchick,

In the response to the Violation Notice of October 19, 2017, Elm Plating Co.'s response dated November 22, 2017, stated that we would provide an Action Plan and Schedule to resolve Violation 6, regarding failure to identify emissions from the three Quench Oil Tanks under the Hardening furnaces in the Permit Application, and that were not being properly captured by a ventilation system. Elm Plating Co.'s response stated that we would obtain consultations and designs from ventilation contractors to capture, control as necessary, exhaust the emissions, and obtain necessary Permit Modifications. Elm Plating Co. had intended to obtain at least three such proposals to select the most practical and cost effective alternative to reduce the impact on the Company and its ability to maintain compliance. To date, we have only been able to obtain one such design proposal from four contractors contacted, with one additional preliminary site visit to begin scope development on December 21.

Elm Plating Co. therefore respectfully requests an extension of the submission date for the Action Plan and Schedule to January 31, 2018. By that date, we expect to have a second design and proposal, and develop a third contractor for this project.

Elm Plating Co. has made progress in the period since the initial Response of November 22 to reduce the concentration of visible particulate inside the Building that could potentially be released through doors to the atmosphere. We have reversed two wall exhaust fans to supply air into the Building to reduce the negative pressure, cleaned the louvers on general exhaust fans, and are continuously inspecting the position of the draft inlets in the walls, that has greatly improved the gravity venting of process vents on the furnaces. We will continue to keep doors closed when not in use to reduce escape of the remaining emissions.

Please feel free to contact me at (517) 782-8161 if you have any questions or comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Allen C. Kinsler".

Allen C. Kinsler
Environmental Manager