



1475 Gezon Parkway SW
Wyoming 49509
(616) 530-0061

May 29, 2018

Mr. Adam Shaffer
Environmental Quality Analyst
Air Quality Division

Mike Helms
Rapid Line, Inc
Chief Financial Officer



Re: Violation Notice, **SRN: P0916, Kent County**

Dear Mr. Shaffer,

Thank you for your inspection on April 12, 2018. This correspondence is our response to your letter dated May 9, 2018.

1. Dates violation occurred: The burn off oven was permitted in 1995 at a prior location operated by Rapid-Line. However, upon relocation in 2001, a permit was not applied for.
2. Explanation of causes and duration of violation: Our burn-off oven has not been permitted at this location since installation in 2001. Rapid Line is an employee owned company and prior to July, 2016 was a minority shareholder. The previous owner did not permit the oven nor was it disclosed during the sale that the oven was not permitted. The sale was handled exclusively by a Trust and current management was unaware that the oven was not permitted until your inspection. As of the date of the violation notification we have ceased operation of our burn-off oven and the equipment is locked out. Please note that although the system was not permitted, regular inspections of the oven have occurred and operation certificates are provided.
3. On-going violation: The violation is not on-going as we have ceased operation of the oven until proper permitting is completed. The oven will remain off until properly permitted or if allowed to operate under a temporary permit.

4. Summary of Actions:

<u>Action</u>	<u>Suspense Date</u>	<u>Completion Date</u>
Cease burn-off oven operations	May 2, 2018	May 2 nd
Submit Permit Application	August 1, 2018	
Implementation of digital recording of burn-off temperatures	August 30, 2018	

5. Steps to prevent reoccurrence: A copy of the permit will be attached to the burn-off oven indicating that the permit is for current location only. Re-location of the equipment will require re-permitting.



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6. Upon investigation of our 5-stage washer, we believe a PTI exemption is possible under R 336.1281 (2)(e). The water is not heated above 100F and the vapor pressures of the chemicals used in the wash and rinse process is less than 0.1 millimeter mercury. Please let me know what your determination is and information I can provide to obtain an exemption.

Best Regards,

A handwritten signature in black ink that reads "Michael A. Helms".

Michael Helms
CFO
Rapid-Line, Inc
616-530-0061

cc: Ms. Heidi Hollenbach, DEQ