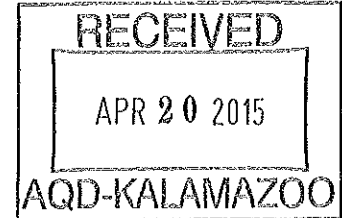


4-14-2015

Dorothy Bohn
Senior Environmental Quality Analyst
Air Quality Division
Department of Environmental Control



Subject: Violation Notice Letter (Dated 4/2/15)

Dorothy per your inspection of our facility on March 30, 2015 the above noted violation letter and various conversations regard the ovens please see the below action we are taking on each item.

A. Medium Burn Off Oven: (Violation condition VI.2)

This oven is equipment with a chart recorder that records both oven temperature and after burner temperature. At the time of the inspection the chart records were operational. Unfortunately the pen on the afterburner chart recorder had run out of ink and no one bother to replace it. This is human error a procedural issue and somewhat inexcusable. Procedural changes have been made and inspection of the chart recorders and pins now has to be made and signed off on every time the oven is started. In addition to this while the oven is in operation a visual check of the after burner temperature will be made and the chart plot will be initialed.

(See attached inspection and sign off sheet)

As far as we know the issue with this pen took place on 12/12/14 it was corrected on 3/30/15

B. Medium Burn Off Oven: (Violation condition VI.5)

I believe we demonstrated to you that we do keep records and record when the oven is used. These records however are filed with the individual job that they pertain to. Therefore the number of batches (burns) in a given month or in a 12 month period is there but not easily obtainable with the present recording method. Changes have been made to record what month and the date of the month the oven is used. This is a 12 month rolling calendar and is now posted at the oven.

(See attached oven use sheet)

C. Medium Burn Off Oven: (Violation condition V1.4)

I remember this item being discussed during the permit application and evaluation. We issued MSDS sheet on or varnish and resin. Other the material being an epoxy or polyester we do not have any way of knowing what the chemical composition is of the other motors we burn out. The material is what every the specific OEM or other repair facility is using in the manufacturing of their motors. All the materials are electrical insulating varnishes or resins. Per your direction we will submit a PI and request and request a revision.

D. Medium Burn Off Oven: (Violation condition VII.1)

This is an over sight on my part I thought an e mail was sent to you last year. I forwarded you this information on 4/6/15

E. VPI System/Cure Ovens: (Violation Rule 201)

As discussed we have records of our varnish use and purchase for the year. They are not presently set up for monthly usage or on a 12 month rolling calendar. Procedural changes have been made monthly usage and inventory is now being tracked. These figures can then be backed up by our purchase record for the years (See attached varnish & resin recording sheets)

Prior to this site inspection we did not know these tanks and ovens were covered under rule 201. I cannot find any past record of these items being brought to our attention.

F. Sandblasting: (Rule 201)

We are in the process of gathering quotes on a collector system. Once all quotes are in we will make a decision on a system and order it. We will notify you when it is ordered and when it gets installed.

Dorothy once you have time to review the above information and the attached documents please let me know if this satisfies the parameters of the violation notice. If you would like to see anything changed or documented differently please let me know we will change it or clarify it. Dorothy I know you will be retiring shortly if this gets passed on to another person would you please send me an e mail with the contact information. Thanks for your help in this matter. If any further action is required by us please let me know.

Sincerely,



Allen Jeske
Director of Repair
HECO INC.
262-381-7200

Cc: Todd Hatfield