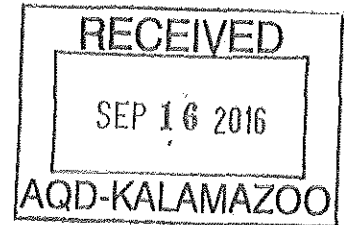




Monica Brothers  
Department of Environmental Quality  
7953 Adobe Road  
Kalamazoo, MI 48909



Dear Ms. Brothers,

This letter serves as the response to the Violations received from the AQD inspection on July 29, 2016 at Wright Coating Technologies, located at 1603 North Pitcher Street, Kalamazoo, Michigan.

**Violation Number One:** Wright Coating Technologies exceeded the 1000 lb/month limit of non-carcinogenic volatile organic compound (VOC) for the Rule 290 exemption of the strip tank during the month of February 2014.

**Corrective Measure:** During the month of February 2014 the level of solution in the tank was below optimum operational level and 6 barrels/drums of solution was added to the tank to correct the issue. Wright Coating Technologies has implemented a new work instruction limiting the amount of solution that can be added to the tank for increasing the level, to 3 barrels/drums. Operators must get permission from maintenance supervision, who maintains the records for compliance, before any chemical can be added to the tank. This will allow Wright Coating Technologies to stay within the guidelines described in the Rule 290 permit that this unit is currently operating under. This issue will be something that is discussed with the permit writer to possibly incorporate into our consolidated active permits.

**Violation Number Two:** Wright Coating Technologies failed to provide records for Emission Unit Line 5 as required by PTI No. 681-87B special condition number 18. This condition requires coating usage records to be kept for metal furniture parts and products.

**Corrective Measure:** Wright Coating Technologies is in the process of modifying/changing our aging permits. Permits will be updated into the new standard and the verbiage adjusted to reflect current business practices.

Thank you for your time and help in getting the facility back into compliance,

A handwritten signature in black ink, appearing to read "Jim Grimes".

Jim Grimes