



5050 Kendrick St SE, Grand Rapids, Mi. 49512

August 6, 2015

Mr. David L. Morgan, Environmental Quality Analyst,
Air Quality Division, MDEQ
Grand Rapids District Office
350 Ottawa Ave, NW Unit 10
Grand Rapids, Mi. 45503

RE: VIOLATION NOTICE SRN: N1786, KENT COUNTY-- JULY 17TH, 2015

Dear Mr. Morgan,

This letter is in response to the Violation Notice letter, dated July 17, 2015 that was received by the Grand Rapids facility of Yanfeng Global Automotive Interiors, formerly JCIM. The violation notice asserted the following three (3) violations.

1. The company did not maintain VOC emission calculations determining the volume-weighted average VOC content of the coatings, as applied on a calendar day basis for EUPAINTLINE1 (PTI #222-10B VI.4.c).
2. The company did not maintain VOC mass emission calculations determining daily emission rate in pounds per calendar day for EUPAINTLINE1 (PTI #222-10B VI.4.d).
3. The company did not maintain VOC emission calculations determining the volume-weighted average VOC content of the coatings, as applied, on a calendar daily basis for EUPAINTLINE2 (PTI# 222-10B VI.4.c).

In review of our records, it appears that the above identified discrepancies occurred when paint line #2 was added in January 2013. This was recently discovered and on June 24, 2015 a corrective action plan was implemented to revise the record keeping program.

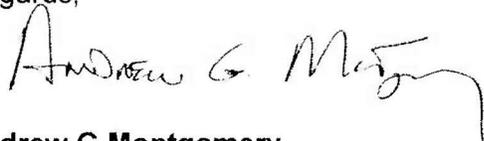
Our daily consumption records were sufficient to determine and calculate the daily emission gaps noted in the violation notice for the period of June 2014 to current. Subsequently, the historical records were supplemented and quality assured for accuracy, which demonstrates compliance with the underlying applicable requirements.

Yanfeng global automotive interior systems co, ltd

On a going forward basis, these records will be maintained and the noted deficiencies should no longer exist. Therefore, we believe the deficiencies noted in the violation notice have been addressed and the enhanced calculation methods should prevent future record keeping issues. We believe this response is timely, to the violation notice request and addresses the outstanding issues.

Should you have any questions, please feel free to contact me at **616-401-4028**.

Regards,

A handwritten signature in black ink that reads "Andrew G. Montgomery". The signature is written in a cursive style with a long, sweeping tail on the "y" in "Montgomery".

Andrew G Montgomery
Environmental, Health and Safety Manager
Yanfeng Global Automotive Interiors
5050 Kendrick St SE, Grand Rapids, Mi. 49512

cc: Ms. Heidi Hollenbach, DEQ
Ms. Lynn Fielder, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ