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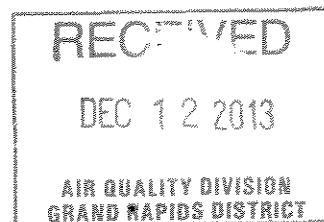
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December 12, 2013

Ms. April Lazzaro,
Senior Environmental Quality Analyst
Air Quality Division
350 Ottawa Ave., NW Unit 10
Grand Rapids, MI 49503-2341



Re: Violation Notice

Dear Ms. Lazzaro:

This is my response to your letter dated December 2, 2013.

It is my understanding that the violation is the result of using more than 200 gallons per month of Acetone used in the Piston department. Our opt-out Permit N3687 under Exempt Rule 287 "(c) (1) allows a maximum of 200 gallons per month, as applied. We should have obtained a permit to allow for our use of Acetone in the volumes utilized.

Initially, Process A was the only chemical used to clean pistons. However, our customer began to send pistons that were not clean enough for proper adhesion. In order to clean the piston adequately Acetone was added to the Process A wipe to better clean the piston. It has been just this past year in February 2013 that an increase of Acetone began due to increased production and increased concentration of Acetone to Process A. The frequency of over 200 gallons per month has been five of the past twelve months; namely, December, February, April, August, October and November.

I did not recognize the increase of usage as being a violation because it was exempt of VOCs. I was not aware that Acetone comes under Rule 290 pertaining to toxic air emissions when over to 1,000 pounds per month. The whole violation is due to my lack of understanding. And, for that, I seek abatement from the violation.

We have found an aqueous process to reduce the use of Acetone. This system will keep us within the guidelines of our current permit and will not need an additional permit. We have the equipment for the system in place and anticipate using the new process by February 24, 2014. We just need our customer's approval to use it. It is understood that should the customer not give us the approval to use aqueous system, we are to apply for a permit to use Acetone for the increased proportions.

To help maintain compliance with our permit, our internal reporting instructions used for monthly reporting will include a review of our usage of all chemicals according to our opt-out Permit.

Thank you for your assistance with this matter.

Sincerely,

Jim Van Os
Jim Van Os

Cc via email: Aariah Van Os, General Manager and Jamie Wynsma, Treasurer