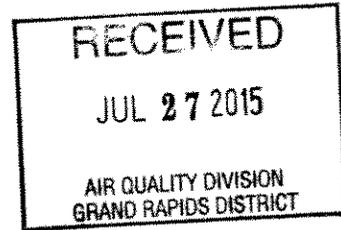


Mr. Dave Morgan
Michigan Dept. of Environmental Quality (MDEQ)
Air Quality Division
350 Ottawa NW Unit 10
Grand Rapids, MI 49503



Submission of Written Response to Violation of PTI No. 151-12, Special Condition VI.2

Dear Mr. Morgan:

Per your violation notice given on July 16, 2015, the violation found on your visit on July 10, 2015, here is the written response requested.

Dates Violation Occurred:

Checking back into our records (circular chart recorder), I, Matt Zomberg, found that the majority of the charts showed the temperature recorded under 1400 degrees F. on our After Burner Temperature from 2013 through July 10, 2015.

Explanation of the Cause of Duration of the Violation:

It was found that when the pens ran out of ink and were replaced, the holding arms were bent causing the pen to be miss-printing the correct temperature (pen was not perpendicular to the circular chart recorder). When Charts were turned in to office to be our Records, the record keeper (Matt Zomberg) did not notice the discrepancy. It was brought to the record keeper's attention that the circular chart recorder is American Rack Company's Record – and needs to show the correct temperatures by Dave Morgan during his visit on July 10, 2015 and it was found to be an ongoing problem.

Summary of Actions that have taken place and are proposed to be taken to correct the violation:

Immediately after visit on July 10, 2015, the pens connecting arms were adjusted to hold the pens perpendicular to the recording discs, matching the digital oven temperature to the recording discs. These records are turned into the record keeper for review. Any indication that the temperature went under the required 1400 degrees F. will be noted on the record disc and reviewed with the supervisors on the floor to determine if the ovens are in need of any maintenance.

Thank you for the help in fixing this matter so American Rack Company can be compliant and let me know if there is anything else that needs to take place regarding this violation.

Regards,

Matthew R. Zomberg

Operations Manager
American Rack Company

A handwritten signature in black ink, appearing to read "Matthew R. Zomberg", with a large, stylized flourish at the end.