

Dear Ms. Leffert:

This letter responds to the inspection at Fletcher Precision Painting's facility, compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451 amended (Act 451).

This response includes:

- i. The dates the violations occurred.
- ii. Explanation of the causes and duration of the violations.
- iii. Whether the violations are ongoing.
- iv. A summary of the actions that have been taken.
- v. It was proposed to be taken to correct the violations.
- vi. Dates by which these actions will take place.
- vii. And what steps are being taken to prevent a reoccurrence?

**1) Rule/Permit Condition Violated** – Use of Xylene for Pretreatment and Metal cleaning parts.  
R 336.1201(1) and EUSOLVENT SC II.1

***Answer: Xylene was discussed as a solvent wipe, but due to the permit restrictions was never implemented.***

The facility has switched to a mixture water based cleaner.

**1.1 Causes and duration of violations:**

Xylene was discussed but not used. No ongoing exceedances to the permit.

**1.2 Summary of CA:**

	<b>Date</b>
I Exclusively switched to a water based cleaner	3/30/2021.
II Trained employees on new parts cleaning procedure	3/30/2021

**1.3 Prevent recurrence.**

I. Employee responsible for logging paint emissions.	3/30/2021
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2.0) **Rule/Permit Condition Violated-** PTI No. 161-17, EUSOLVENT, S.C. I.1

2.1) **Causes and duration of violations ongoing**

Fletcher used 90gallons of acetone for paint hose cleaning flush date ending 12-31-2020. An enclosed air assist (HVLV) system includes paint gun and hose line. To maintain the integrity of the equipment per manufacture, acetone remains in the hose (paint line) when not in use.

The employee responsible for the paint logs was off due to COVID-19.

Once the violations were reported, Fletcher took corrective actions.

2.2) **Fletcher Summary of Actions and dates to obtain compliance.**

<b>Fletchers Action Summary</b>	<b>Date of C of A</b>
Switching to water-based cleaner	3/30/2021
Policy on limiting acetone purchases for parts cleaning to 20g /yr.	4/15/2021
The employee responsible for daily paint logs	3/30//2021
Training employees covered by this procedure	Ongoing
Researched the amt of acetone emissions during cleaning & hose flush. Results – Zero emissions.	4/26-27/2021

2.3) **Fletchers Proposed Actions and the timeline for compliance**

Fletcher has reviewed the amount of acetone for line cleaning and will maintain ongoing usage.

2.4) **Fletchers Proposed steps to prevent a recurrence.**

I The employee is back to work from COVID -19 and is updating and logging paint usage daily basis.

II Ongoing training of employees

Best Regards,

Terry Fletcher

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