



STATE OF MICHIGAN
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 SOUTHEAST MICHIGAN DISTRICT OFFICE



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

March 25, 2019

Mr. James Jensen
 Plant Manager
 Lafata Enterprises Inc.
 50905 Hayes Road
 Shelby Township, MI 48315

SRN: B7625, Macomb County

Dear Mr. Jensen:

VIOLATION NOTICE

On November 2, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Lafata Enterprises Inc. located at 50905 Hayes Road, Shelby Township, Michigan. The purpose of this inspection was to determine Lafata Enterprises Inc.'s 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, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B7625-2017.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-Autoline2 – An automated coating line used to paint wood furniture.	ROP No. MI-ROP-B7625-2017 EU-Autoline2 – Special Condition II-1	The primer/surfacer used on this line, E63W50, exceeded the maximum VOC content limit of 4.6 lb/gallon as applied.

ROP No. MI-ROP-B7625-2017 EU-Autoline2 – Special Condition II-1 limits the VOC content of sealers/primers to 4.6 lb/gallon (minus water) as applied. Based on the results Lafata Enterprises Inc. obtained from a recent EPA Method 24 analysis of several coatings, one of the coatings, E63W50, exceeded the maximum VOC content of 4.6 lb/gallon as applied. The EPA Method 24 analysis was conducted by Sherwin Williams (Lafata Enterprises Inc.'s current coating supplier) at their Greensboro, North Carolina facility. The EPA Method 24 report provided by Sherwin Williams indicates a VOC content of 4.82 lb/gallon as applied for E63W50.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 15, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

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violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

To prevent a reoccurrence, I recommend that Lafata Enterprises Inc. perform periodic EPA Method 24 analysis on E63W50 as applied, as well as other coatings (especially if they are close to the 4.6 lb/gallon VOC limit). Other coatings should be selected on a rotating basis so that eventually all coatings are tested. Please include a plan for periodic EPA Method 24 analysis in your violation notice response.

Please submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lafata Enterprises Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Lafata Enterprises Inc. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam Bognar
Environmental Engineer
Air Quality Division
586-753-3744

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Joyce Zhu, DEQ