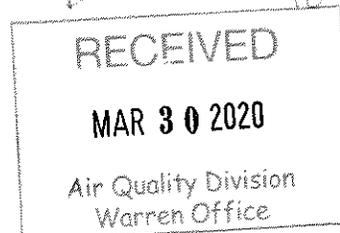




Performance, **sprayed.**

From: SprayTek, Inc.  
2535 Wolcott  
Ferndale, MI 48220

To: Department of Environment, Great Lakes, and Energy  
Warren District Office  
27700 Donald Court  
Warren, MI 48092-2793  
Attn: Jenine Camilleri, Enforcement Unit Supervisor



Re: SprayTek, Inc.: Violation Notice, SprayTek, Inc. Ferndale, MI  
SRN: N0917

March 27, 2020

To whom it may concern:

I am writing in response to the Violation Notice letter to SprayTek, dated March 11, 2020. The letter detailed two violations identified during an inspection at SprayTek on February 25, 2020.

Item 1: Batch 1, Spray Booth: (Rule 336.1201(1); Permittee exceeded the R 336.1277(2)(c) exemption coating use rate limit of 20 gallons, as applied, minus water, per month during May, June, September and October 2019. Monthly coating use rates were 211, 205, 202, and 236.5 gallons prospectively.

Item 2: Batch 2, Spray Booth: (Rule 336.1201(1); Permittee exceeded the R 336.1277(2)(c) exemption coating use rate limit of 20 gallons, as applied, minus water, per month during May, June, July, September and October 2019. Monthly coating use rates were 210, 298, 202, 256 and 278 gallons prospectively.

With the sudden departure of the person responsible for the monitoring, reporting and ensuring compliance of SprayTek's air permit, Susan Apczynski took over these responsibilities. The previous EHS person did not document or communicate that there was a limit for these spray booths and that they were exempt, therefore this was not enforced. Based on past records the spray booths have always been calculated in the totals, therefore there was no indication that there was a limit that had to be monitored. These violations are no longer continuing. The use rates for December, January and February for Booth 1 are 193, 161, and 98. Booth 2: 198, 161.5 and 55.

We have transferred some work from these booths to our EUWASHLINE in the interim until our Permit to Install Modification is approved.

Attached is our Permit to Install Application requesting modification to the existing permit to include the spray booths. This will ensure SprayTek will not be in violation of the exemption going forward.

Thank you,  
  
Susan Apczynski  
Quality Assurance Manager / EHS  
SprayTek, Inc.