



October 15, 2024

Ms. April Lazzaro
Michigan Department of Environment, Great Lakes, & Energy
350 Ottawa, N.W.
Grand Rapids, MI 49503

Re: Lacks Paint Central – Violation Notice Written Response

Ms. Lazzaro:

This letter is in response to the Violation Notice dated September 24, 2024 regarding the Lacks Enterprises, Inc. Paint Central facility. Permit to Install No. 110-18B, FGCENTRALPAINT, Special Condition No. VI. 5. requires the differential pressure between the Permanent Total Enclosure (PTE) and the adjacent area be monitored and recorded with all records kept on file and available to the Department upon request. Although the data and associated records are recorded and retained by the monitoring system or maintenance and process records, Lacks was unable to produce the entirety of the records in a timely and satisfactory manner.

Duration

The records request was received by Lacks on July 10, 2024. Specifically the request was for pressure drop data from March, June, October 2023 and March and June 2024. The March and June 2024 data was available and provided on July 19, 2024. Data from 2023 was provided on September 13, 2024. This was raw data in a format that did not include any additional information such as indications of no-production or downtime.

Cause and Corrective Actions

Due to the vast amount of data being recorded by the FactoryTalk program (both environmental and process related), once archived it became very cumbersome to extract the data back out of the system and the system was not able to produce the data in a user friendly format. The long term corrective action plan is to have the Paint Programmer set up an environmental page in the FactoryTalk system which will focus on collecting, organizing, producing, and saving environmental related data and

reports. This page will more easily and efficiently produce trend data, alarm logs, and related information pertaining to environmental equipment including the paint booths, Spinelle scrubber, and RTO. The target date for completion is November 1, 2024. In the interim, maintenance staff are saving a daily screen grab of the booth pressure trend data for each production day and will include information pertaining to any downtime or maintenance activities if applicable.

Please contact me if you have any questions.

Sincerely,

Karen Homrich

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cc: Ms. Jenine Camilleri, EGLE