



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

May 11, 2021

Mr. Jason Fogelsonger
Lacks Enterprises, Inc.
4375 52nd Street
Kentwood, Michigan 49512

SRN: N2079, Kent County

Dear Mr. Fogelsonger:

VIOLATION NOTICE

On April 20, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed stack testing of Lacks Enterprises, Inc. Paint Central Facility located at 4375 52nd Street, Kentwood, Michigan. The purpose of this inspection was to determine Lacks Enterprises, Inc. Paint Central Facility'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 Permit to Install (PTI) number 110-18A.

During the stack test, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGCENTRALPAINT	Permit to Install No. 110-18A, Special Condition No. IV.3 and Rule 910	Failure to achieve a 95% destruction efficiency for the regenerative thermal oxidizer.

On April 20, 2021, the AQD staff observed FGCENTRALPAINT while the regenerative thermal oxidizer was operating below the required 95% destruction efficiency. This constitutes a violation of Permit to Install No. 110-18A and Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Additionally, staff of the AQD Technical Programs Unit was on-site during the stack testing. It was determined that the location of the inlet port does not meet the requirements of 40 CFR Part 60, Appendix A, Method 1. Prior to conducting stack testing again, please identify a location in the inlet duct that meets the requirements of 40 CFR Part 60, Appendix A, Method 1.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 1, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the 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.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 40503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lacks Enterprises, Inc. Paint Central Facility 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 Lacks Enterprises, Inc. Paint Central Facility. 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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Ms. Karen Baweja, Lacks
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE