



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

September 28, 2020

To whom it may concern:

I am writing in response to the Violation Notice letter to SprayTek, dated September 10, 2020. The letter detailed four violations identified during an inspection at SprayTek on September 10, 2020. During the inspection it was observed that SprayTek failed to maintain measures necessary to minimize the generation of fugitive VOC emissions (PTI No. 043-04C Special Conditions III. 1, 3, and 4: and Appendix 2, 5, and 6. Also, SprayTek failed to maintain measures to minimize the generation of fugitive VOC emissions resulting in an unreasonable interference with the comfortable enjoyment of life and property (R 336.1901).

Violations observed:

- Item 1: Paint soaked rags lying in the open on paint mixing equipment.
- Item 2: Three uncovered 5-gallon plastic bucket liners that were partly filled with liquid paint.
- Item 3: An open 55-gallon waste drum overfilled with paint-soaked rags.
- Item 4: A 55-gallon waste drum with a completely uncovered hazardous waste funnel.

Date of occurrence: September 10, 2020

Cause and Duration: Due to the Covid-19 pandemic, the staff member who was responsible for the day to day operations of the paint room left the employment of SprayTek and since his departure filling positions have been very challenging. This duty then fell on the shift supervisor who failed to ensure all safety protocols per PTI No. 043-04C and the FGCOATING Rules were being followed on a regular basis. The above violations were corrected immediately on the day of the inspection.

The violations are no longer ongoing. The staff was instructed on the proper methods used to minimize the generation of fugitive VOC emissions in order not to interfere with the comfortable enjoyment of life and property.

9/21/2020: SprayTek generated and posted instructions for paint mixing equipment housekeeping, the sealing of partial containers, the proper use of the hazardous waste funnel and the proper use of the material waste drum. (Pictures of postings area included in this corrective action)

9/28/2020: Held a training/communication meeting with all shifts. Subject of training covered recent violations and how to minimize Fugitive VOC Emissions and also our responsibility for the health and safety of our staff and our neighbors.

Management is performing daily walkthroughs to ensure all aspects are being followed.

Thank you,



Susan Apczynski
Quality Assurance Manager / EHS
SprayTek, Inc.