

- 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

May 28, 2021

To whom it may concern:

I am writing in response to the Violation Notice letter to SprayTek, dated April 13, 2021. The letter detailed four violations identified during an inspection at SprayTek on March 30, 2021. 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 Appendix 4.a).

Violations observed:

Item 1: Uncovered 5-quart bucket containing ¹/₄" of solvent (Batch 2 Spray Booth) Item 2: 5-gallon pail approximately half full of waste solvent that was improperly covered with a warped loose fitting lid (Batch 2 Spray Booth) Item 3: Uncovered 5-gallon bucket with approximately ¹/₂" of solvent (EULINE2) Item 4: Uncovered paint pot containing residual drying surface coating material that was generating fugitive emissions (Batch 1 Spray Booth)

Date of occurrence: March 30, 2021

Cause and Duration: On the date of the occurrence the shift supervisor failed to ensure that all containers used during the application process were covered to minimize the emission of fugitive emissions and odors. Shift supervisor also failed to ensure that SprayTek captures all waste coatings and keeps them stored in closed containers except when operator access is necessary.

On the day the violation occurred Management had the uncovered containers properly covered.

product at the workstations and how to keep all containers covered to minimize the emission of 4/16/21: Generated a safety alert and held a meeting with the staff to reinforce the proper use of odors.

properly covered. Management and supervisors are performing daily walkthroughs to ensure all containers are

Thank you,

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Susan Apczynski Quality Assurance Manager / EHS SprayTek, Inc.