



October 15, 2015

Mr. Dave Morgan
Air Quality Division
Department of Environmental Quality
350 Ottawa, N.W.
Grand Rapids, MI 49503

Re: 52nd St. Paint East – ROP No. MI-ROP-N2079 -2012

Mr. Morgan:

This letter is in response to the Violation Notice dated September 30, 2015 regarding the Lacks Enterprises, Inc. 52nd Street Paint East facility. The violation is for using a conventional hand spray applicator on the manual clear coat booth rather than an electrostatic applicator as required by the ROP.

SEQUENCE OF EVENTS

On Tuesday, September 15, 2015 Dave Morgan conducted an inspection of the 52nd Paint East, Paint West, and Molding facilities. Karen Baweja, Alan Beatty, and Steve Lazarus accompanied Dave on the Paint East portion of the inspection. As part of a follow up to the inspection, Dave requested copies of the specification sheets for the Paint East manual spray guns. The spec. sheets, including gun and air cap models, were sent to Dave on Tuesday, September 22, 2015.

On Thursday, September 24, 2015 we received a phone call from Dave Morgan informing us that the spec. sheets indicated that the spray guns being used on the manual clear coat booth were conventional applicators while our ROP states we are to be using electrostatic. After confirming with Paint East personnel that the guns were conventional and not electrostatic, we began to search for past documentation or correspondence with the DEQ to indicate why the change had been made to use a conventional hand sprayer instead of the previously used electrostatic sprayers. This search yielded no results, however maintenance records were found regarding the change.

On Monday, September 28, 2015 Paint East ordered a Ransflex electrostatic applicator to trial in the manual clear coat booth. The trial gun arrived and was installed on Wednesday, September 30, 2015 to begin the trial.