



June 1, 2021

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

Re: Paint Central – Violation Notice Written Response

Ms. Lazzaro:

This letter is in response to the Violation Notice dated May 11, 2021 regarding the Lacks Enterprises, Inc. Paint Central facility. The violation was for failing to achieve a 95% destruction efficiency for the regenerative thermal oxidizer (RTO).

Duration

Destruction efficiency testing was conducted on the RTO on April 20, 2021 by Network Environmental. During the first test run, the unit was only achieving a destruction efficiency of approximately 93%. The two remaining test runs were not completed. The duration of the violation is unknown as this was the initial test conducted on this unit

Cause and Corrective Actions

During a thorough inspection of the unit on April 22, 2021, it was found that the air pressure for the damper was set to 18 PSI. This was adjusted to the manufacturer's specification of 60 PSI. Because of the low air pressure, the damper was not sealing properly when changing over between the beds allowing additional VOCs to escape lowering the overall efficiency of the unit. Lacks will purchase and install a lockable regulator to prevent reoccurrence. Additionally, a bake-on of the unit was performed for 5 hours on April 22, 2021 to destroy any material build up that may have been present to assist with ensuring proper seal of the damper.

On May 20, 2021, Network Environmental was on site to conduct an engineering study on the unit to verify that the corrective actions improved the efficiency back into compliance. Testing showed the unit was achieving a destruction efficiency of approximately 97%.

Lacks will work with Network to re-schedule an official compliance test and will notify EGLE of the new testing date as soon as it is scheduled.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Karen Baweja". The signature is written in a cursive style with a large, sweeping flourish under the name.

Karen Baweja

Environmental Manager

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