



March 3, 2022

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

**Re: Lacks Paint West – Violation Notice Written Response**

Ms. Lazzaro:

This letter is in response to the Violation Notice dated February 10, 2022 regarding the Lacks Enterprises, Inc. Paint West facility. Permit MI-ROP-N2079-2017 specifies a limit of 5.0 pounds of VOC per gallon of coating minus water, as applied, based upon a calendar averaging time period as determined at the end of each calendar day. The violation was for exceedance of this coating VOC content limit. It should be noted that although this coating content limit has been exceeded Lacks continues to maintain VOC emissions well below permit limits.

**Duration**

The violation began June 9, 2021 when the average VOC content for the day was 5.21 pounds per gallon. While Lacks is making attempts to minimize exceedances of this daily average limit and diligently exploring short and long term solutions, the violation not a daily occurrence but is ongoing.

**Cause and Corrective Actions**

The permit requires, on an annual basis, the VOC content of the five most frequently used coatings, plus 2% of the remaining coatings, be verified as received and as applied using federal reference Method 24. The analysis was conducted in May of 2021 and coating contents were updated in June based on results. These results indicated an increase, above 5.0 pounds VOC per gallon, in some of these frequently used coatings. Historically, spraying non-red and black manual coatings above 5.0 pounds VOC per gallon did not create exceedances because the demand for manual spray service jobs from customers was much larger and higher VOC content coatings could be sprayed in conjunction with lower VOC content coatings bringing down the daily average below 5.0 pounds per gallon. Lacks has seen this need for

hand spray decline greatly over time, leaving only a limited number of service paints in use and we are no longer always able to pair our higher VOC paints with lower VOC paints to maintain compliance with the daily average content limit.

We had some of the higher VOC content coatings retested by Prein&Newhof and results indicated the VOC content of each of these coatings was below 5.0 pounds per gallon. We are currently working with suppliers to ensure our calculated VOC contents based on manufacturer and mix formulas are accurate to compare with the results from Prein&Newhof. Additionally, R&D and Process staff are evaluating the feasibility of current solvent blends to determine if they can be reformulated to include any exempt solvents to further reduce the as applied VOC content of the coatings. This work is ongoing. Lacks staff also have a meeting with Fishbeck on March 9, 2022 to discuss re-permitting opportunities for the facility including options for tying the hand spray booths into the RTO as a more effective measure of control.

As many of these current and long term corrective actions are ongoing, Lacks will provide EGLE with a progress update by April 1, 2022.

Please contact me if you have any questions.

Sincerely,

*Karen Baweja*

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cc: Ms. Jenine Camilleri, EGLE