

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Other

N207955209

| | | |
|--|--------------------------------------|----------------------------------|
| FACILITY: Lacks Industries, Inc. | | SRN / ID: N2079 |
| LOCATION: 4375 52ND STREET SE, KENTWOOD | | DISTRICT: Grand Rapids |
| CITY: KENTWOOD | | COUNTY: KENT |
| CONTACT: Karen Baweja , Supervisor of Air Quality | | ACTIVITY DATE: 09/09/2020 |
| STAFF: April Lazzaro | COMPLIANCE STATUS: Compliance | SOURCE CLASS: MAJOR |
| SUBJECT: Partial Compliance Inspection towards FY 2021 Full Compliance Evaluation. Observation of Paint East and Paint West RTO interlock test. | | |
| RESOLVED COMPLAINTS: | | |

Staff, April Lazzaro met with facility representative Karen Baweja at Paint East at 1:00 PM to observe the RTO Low Temperature Shut Down Test. Proper PPE was utilized and social distancing was observed to the extent possible.

Ms. Baweja and I proceeded back to Steve Lazarus's office to observe the shut down activities. In Mr. Lazarus's office, he had multiple computer screens open. One of the screens showed each of the robotic spray booths that are in operation at the facility. Another screen showed the status of the RTO and it's functions.

Mr. Lazarus indicated that the alarm setpoint was 1,450°F. He went outside to the RTO and disconnected the burner gas linkage, which was observed on the RTO display. We observed both screens for approximately 10 minutes as we waited for the temperature to lower to the setpoint. At the time the temperature went below the set point, we observed that the robotic spray arms stopped spraying paint. The robots did however, continue moving through the programmed sequence. A temperature alarm flashed on the screen, and Mr. Lazarus received a call from Lacks dispatch alerting him to a problem with his equipment. The equipment properly responded to the test, and Mr. Lazarus reengaged the linkage.

Ms. Baweja and I left the facility and drove over to Paint West and met with Paul Bosselaar. During the test Mr. Bosselaar ensured that there were robots in operation. There were multiple computer screens to observe. One of the screens showed each of the robotic spray booths that are in operation at the facility. Another screen showed the status of the RTO and it's functions.

The RTO burner gas linkage was disconnected, which was observed on the RTO display. As we observed the temperature drop, it went below the expected set point of 1,450°F, and no shutdown occurred. It continued down to 1,375°F, and at that point, we observed that the robotic spray arm stopped spraying paint. The robot continued moving through the programmed sequence. A temperature alarm flashed on the screen. It was unclear to Lacks personnel why the setpoint on the RTO was 1,375°F, instead of the expected 1,450°F.

Ms. Baweja stated that she had just reviewed temperature charts at the facility for the deviation report review, and confirmed that there had been no temperature deviations.

In a report dated September 15, 2020, Ms. Baweja stated that Lacks is investigating when and why the low temperature set point at Paint West was changed from 1,450°F to 1,375°F. While the setpoint was incorrect, the paint spray robots responded correctly to the actual set point and as such, is considered a successful/compliant test.

Both Paint East and Paint West conducted compliant tests of the automatic low temperature shut down systems.

NAME April Lazzaro DATE 09/18/2020 SUPERVISOR HH