



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 10, 2022

Mr. Joe Voss
Lacks Enterprises Inc. Paint West
4375 52nd Street
Kentwood, Michigan 49512

SRN: N2079, Kent County

Dear Mr. Voss:

VIOLATION NOTICE

On December 16, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Lacks Enterprises Inc. Paint West facility (Lacks) located at 4375 52nd Street, Kentwood, Michigan. The purpose of this inspection was to determine Lack’s compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N2079-2017.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGWESTMANUAL	MI-ROP-N2079-2017, Section 1, FGWESTMANUAL, Special Condition No. I.4	Exceedances of coating VOC content limit

During the inspection recordkeeping review, AQD identified that Lacks exceeded the coating content limit of 5.75 pounds per gallon of coating, minus water, as applied. It was also noted that Method 24 testing was conducted in May, but the recordkeeping was not updated to include the new coating VOC contents until September. A request for updated records was made, and a review found that 18 exceedances of the limit occurred during the months of June – November 2021.

Lacks is advised to resubmit the ROP Report Certification for the Semi-Annual period of January 1, 2021 to June 30, 2021 to properly reflect the facility compliance status during that time.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 3, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lacks believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Lacks. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Ms. Karen Baweja, Lacks
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE