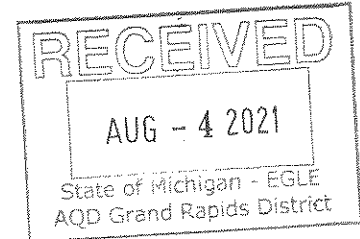


LAKELAND MONROE
GROUP

July 29, 2021

Mr. David Morgan
EGLE – Air Quality Division
Grand Rapids District Office
350 Ottawa Avenue, NW Unit 10
Grand Rapids, MI 49503



**re: Lakeland Monroe Group (SRN N5155)
Violation Notice of July 15th**

Dear Mr. Morgan,

Lakeland Monroe Group is in receipt of your Violation Notice of July 15th alleging a violation of special conditions of PTI No. 224-06A.

You have requested that actions be initiated to correct the alleged violations and have also requested a written response by August 5, 2021. You have indicated that the written response should include the dates that the violations occurred, an explanation of the cause and duration of the violation, whether the violation is ongoing, a summary of the actions that have been taken and are proposed to be taken to correct the violation and that dates by which these actions will take place, and what steps are being taken to prevent a reoccurrence.

Paint Lines 3 and 4 – FGCOATINGLINES Special condition VI.5 – Daily Oven Temperature Records Not Maintained.

The cause of this issue was related to the change of ownership. We have always monitored temperature, but we were recording this information weekly instead of daily as required by our permit. Oven temperatures are now being manually recorded daily and the issue is not ongoing.

Specifically, oven temperature logs were placed at the oven control panels. We've developed work instructions and provided training to ensure this data is recorded at least once per operating day. The information recorded daily will include the date, time, line number, actual temperature, and the initials of the employee recording the temperature.

Permit compliance reviews have also been added to our internal management review process to prevent a reoccurrence.

The recording of data began on Line 3 on June 11th and on Line 4 on June 14th.

Paint Line 5 with regenerative thermal oxidizer – EU COATING LINE 5 Special Condition VI.2 – RTO operating temperature records were not maintained for the past twelve-month period.

The data recorder associated with the Line 5 RTO has always been measuring temperature. However, we discovered that the data logger can only store a limited amount of temperature data and old data was lost when the memory was full and new data was being recorded.

We've developed work instructions and provided training to ensure the temperature records are downloaded at least once per month. The RTO temp recordings have been put on a company server which is backed up daily. This will eliminate the issue of data being overwritten.

Please note that RTO also has an interlock that will shut down the line if the combustion temperature drops below the operating set point. We never experienced a shutdown of the line due to low temperature. As a result, we are confident that there were no instances of excess emissions during the period where the data logger memory was full.

I hope that the information provided is acceptable but please let me know if you have any questions. Thank you for your time and cooperation in this matter.

Sincerely,



Norm Day
Director of Operations

c: Jenine Camilleri, Enforcement Unit Supervisor