



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 24, 2022

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

SRN: N2079, Kent County

Dear Joe Voss:

VIOLATION NOTICE

On October 18, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), reviewed stack test data indicating that Lacks Enterprises, Inc. Paint West facility located at 4375 52nd Street, Kentwood, Michigan failed to meet the permitted destruction efficiency requirement for a thermal incinerator. The purpose of this review was to determine Lacks Enterprises, Inc. Paint West facility'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 review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGWESTROBOPAINT	MI-ROP-N2079-2017, Section 1, FGWESTROBOPAINT, Special Condition III.3; Rule 910	Failure to maintain a thermal incinerator destruction efficiency of 95%.

Information observed by the AQD's Technical Programs Unit staff while on-site indicated that the thermal incinerator at the Lacks Enterprises, Inc. Paint West facility was not meeting the 95% destruction efficiency requirements of the permit. This is a violation of MI-ROP-N2079-2017, Section 1, FGWESTROBOPAINT, Special Condition No. III.3 and Rule 910.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 14, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and

Joe Voss
Lacks Enterprises, Inc.
Page 2
October 24, 2022

are proposed to be taken to correct the violation 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 Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lacks Enterprises, Inc. 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 violation cited above. If you have any questions regarding the violation 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: Karen Homrich, Lacks Enterprises, Inc.
Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE