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Posted 3/25/19

Corrective Action Response		CAR Number:	03/19/2019
Assignee: Leon Kresek		Violation Date:	11/8/16 to 2/27/19
Service Environmental Engineering, Inc. 42834 Mound road Sterling Heights Michigan 48310 95860 731-5881 Consultant: William Teasal			
Phone:	(586) 817-0066	E-mail:	lkresek@Paslin.com
From:	Standard/Spec/Drawing	Reply Due Date:	3/20/19
Leon Kresek	Standard Process		
Department Location:	Department Name:	Element:	Painting
Paslin 25411 Ryan road Warren Mi 48091 Plant 1	Manufacturing Paint department	Major	X
		Minor	
DEQ Site Visit 1/10/2019			

Problem Identification:
 Purge /clean up records/usage for Daily, monthly, yearly VOC/HAP totals not recorded & maintained

Facility did not maintain a current listing of SDS sheets from the manufacture of the chemical composition of each coating, including the weight of each component.

Violation list
 PTI201-16, Section VI. 3b.
 PTI201-16, Section VI. 3c.
 PTI201-16, Section VI. 3d
 PTI 201-16, Section VI. 3e
 PTI 201-16, Section VI. 4
 PTI 153-16, Section VI. 2
 PTI 153-16, Section VI. 3a
 PTI 153-16, Section VI. 3c
 PTI 153-16, Section VI. 3e

Random month of July 2018 was select by the DEQ during the site visit on 1/10/19
 All invoices for paint and chemicals used in the painting process for that month
 Were submitted the DEQ via email on 1/11/2019

Immediate Correction:

Contacted Service Environmental on February 28th 2019 to notify them of the violation notice issued by the DEQ. Meet with painter and Service environmental on February 28th, 2019 to develop plan going forward. Plan is as follows, Painter will log the amount and frequency of product used to prior to cleaning spray gun equipment. New Dailey painters log sheets were created on 2/28/2019 with purge/clean up row to record data. Data will then be added to the monthly/yearly spreadsheets created by Service Environmental. Plan went into effect on 2/28/2019. Coating SDS sheets for base paint and color pigments were requested from supplier (Norkan) on 3/6/19 and were submitted to the DEQ on 3/13/19 for review.

Root Cause:

Human error (Record keeping) From November 22nd, 2016 to February 28th 2019 No purge/clean up data/records were being tracked and or recorded for VOC/HAP Daily, monthly, yearly rolling Totals.

Corrective Action Verification Plan:

Track and record purge/clean up usage VOC and HAP in pounds, gallons, and tons with rolling yearly totals on monthly spreadsheets. Maintain SDS chemical compound sheets for each coating. Paint log sheets were updated to include purge/clean up usage totals. Violations have been corrected and is not ongoing effective date 2/28/2019

Follow Up:

Paperwork submitted for review on 3/15/2019
SDS sheets submitted for coating chemical composition for review on 3/13/2019

Responsible for action:	Leon Kresek	Date: 3/19/2019
QA verify plan:	William Teasel (Service Environmental)	Date: 3/19/2019
QA closure of actions:		Date: TBD