



From: SprayTek, Inc.
2535 Wolcott
Ferndale, MI 48220

To: Department of Environment, Great Lakes, and Energy
Warren District Office
27700 Donald Court
Warren, MI 48092-2793
Attn: Jenine Camilleri, Enforcement Unit Supervisor

Re: SprayTek, Inc.: Violation Notice, SprayTek, Inc. Ferndale, MI
SRN: N0917

September 13, 2022

To whom it may concern:

I am writing in response to the Violation Notice letter to SprayTek, dated July 29, 2022. The letter detailed three violations identified during an inspection at SprayTek on July 22, 2022. During the inspection it was observed that SprayTek failed to install exhaust filters in a satisfactory manner which resulted in gaps that allow particulate material to bypass the control devise (PTI No. 143-04D, FGRULE621, IV.1 and R 336.1910). Also SprayTek failed to maintain measures to minimize the generation of fugitive VOC emissions (PTI No. 143D, FGRULE621, III.3)

Violations observed on July 22, 2022:

Item 1: EUBATCH and EUWASHLINE Booth #1 – the manner in which the exhaust filters were installed resulted in gaps

Item 2: EUBATCH and EUWASHLINE Booth #1 – the manner in which the exhaust filters were installed resulted in gaps

Item 3: A one-gallon can of acetone was left uncovered when the operator was absent.

Cause: On the date of the occurrence the operator(s)

- 1) Failed to ensure there the filters were installed correctly prior to operating the spray booth. No system in place to inspect the air filters
- 2) Failed to install the air cleaning device (filters) in a satisfactory manner (no gaps). No visual aids available at the workstation(s) indicating correct and incorrect installation
- 3) After cleaning the viscosity cup the operator failed to ensure the open one gallon can covered or placed in the hazardous waste drum after use to minimize the emission of fugitive emissions and odors.
 - a. On the day the violation occurred Management had the uncovered container properly covered.

The violations are no longer ongoing. The staff was instructed on the proper installation of air filters and the inspection required prior to the start of the spray booth(s). The staff was also instructed on methods used to handle all VOC and/or HSP materials including coatings and solvents in a manner to minimize the generation of fugitive VOC emissions by ensuring all containers are covered at all times except when operator access is necessary.

- 1) Updated the Batch Spray Production log to include a filter inspection sign off.
- 2) Implemented the use of clips for the installation of the filters in the batch booths
- 3) Implemented the installation of filters under the grates followed by the filter placed on top of the grates in the EUWASHLINE Booth (Carrier booth).
Note: This gives us double protection
- 4) Generated and posted visual aids so the operator(s) are aware of the proper installation and placement of the filters to ensure the filters are installed in a satisfactory manner to prevent any particulate material to bypass the control device (filter).
- 5) Generated and posted an EHS ALERT with instructions for not leaving open containers in the paint room and disposal after use
- 6) Held a training/communication meeting with all shifts. Subject of meeting covered recent violations, how to properly install paint booth filers and how to minimize Fugitive VOC Emissions by ensuring all containers are covered

Thank you,



Susan Apczynski
Quality Assurance Manager / EHS
SprayTek, Inc.

EHS ALERT

DO NOT LEAVE OPEN CONTAINERS OF SOLVENT IN THE PAINT ROOM



AFTER USE DISPOSE OF SOLVENT IN THE HAZARDOUS WASTE CONTAINER



BATCH SPRAY BOOTHS PRODUCTION FORM

BOOTH# _____

FILTER INSPECTION CHECK: NO GAPS IN FILTER PLACEMENT: _____ (Oper. Initials)

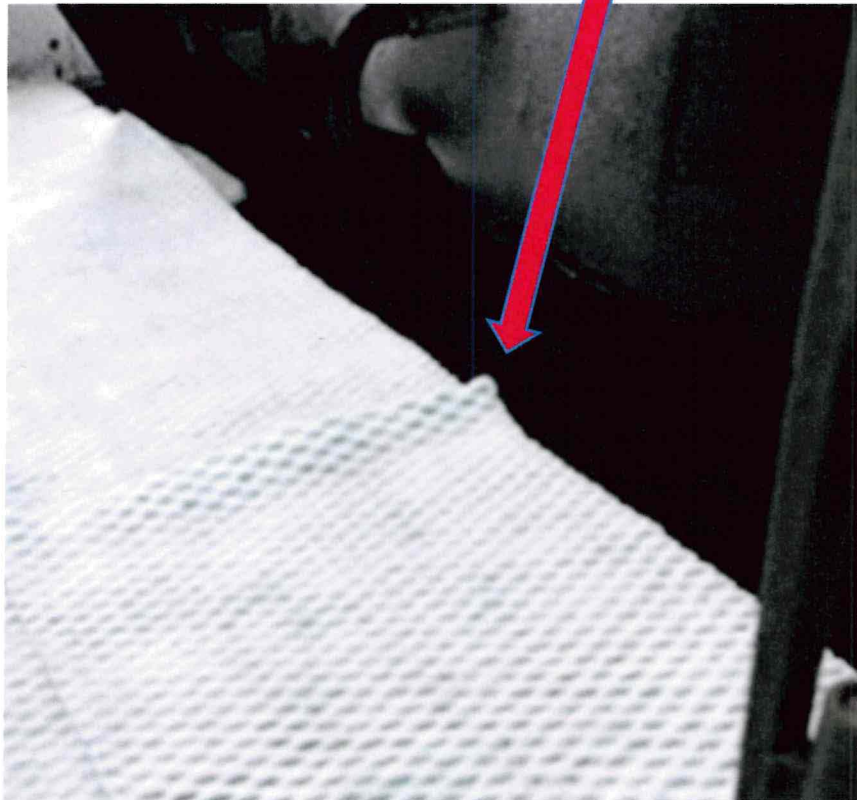
Shift	Date (mm/dd/yy)	Time	Customer	Part #	Job / Sales Order #	Lot #	Paint	Paint Batch/Lot #	Fluid Pressure	Air Pressure	Coating Base/Top	Parts Painted	Cure Oven Temp	Oper. Initials
Shift	Date (mm/dd/yy)	Time	Customer	Part #	Job / Sales Order #	Lot #	Paint	Paint Batch/Lot #	Fluid Pressure	Air Pressure	Coating Base/Top	Parts Packed	Cure Oven Temp	Oper. Initials

Approved by: *Susan Apozynski*

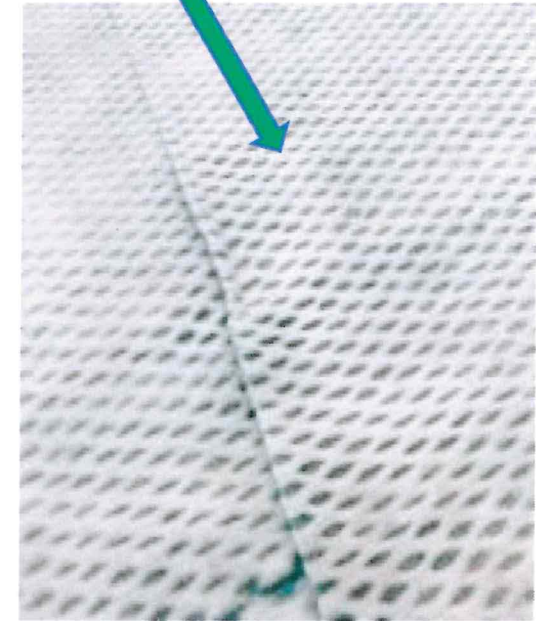
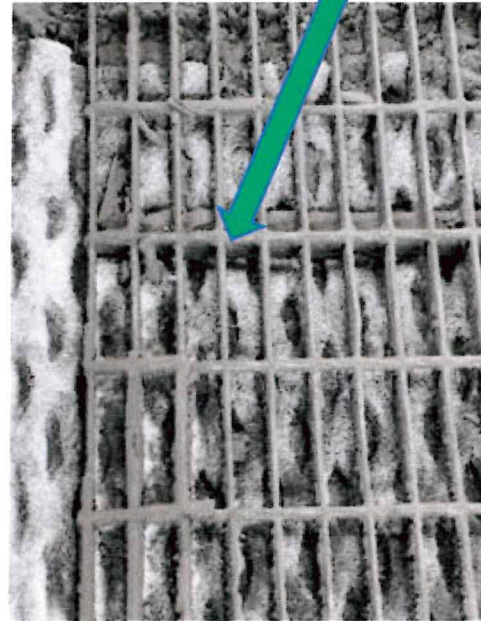
Date: 1/4/2021

CARRIER SPRAY BOOTH

DO NOT OPERATE
SPRAYBOOTH WITH
GAPS/ROLLS IN THE FILTERS

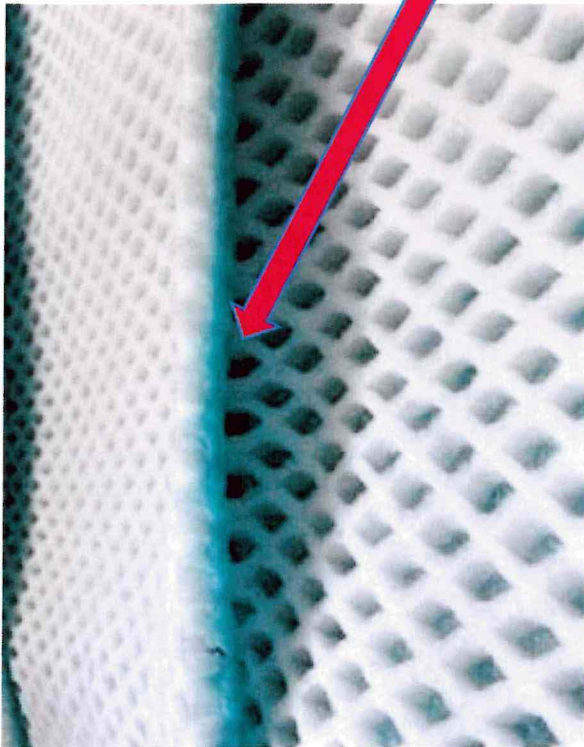


INSTALL FILTERS UNDER
THE GRATES IN THE SPRAY
BOOTH THEN INSTALL THE
FILTER OVER THE GRATES



ALL BATCH SPRAY BOOTHS

DO NOT OPERATE
SPRAYBOOTH WITH
GAPS IN THE FILTERS



USE CLIPS TO ENSURE
THERE ARE NO GAPS IN
THE FILTERS

