



November 14, 2022

Ms. April Lazzaro
Michigan Department of Environment, Great Lakes, & Energy
350 Ottawa, N.W.
Grand Rapids, MI 49503

Re: Lacks Paint West – Violation Notice Written Response

Ms. Lazzaro:

This letter is in response to the Violation Notice dated October 24, 2022 regarding the Lacks Enterprises, Inc. Paint West facility. Permit MI-ROP-N2079-2017, Section 1, FGWESTROBOPAINT, Special Condition III. 3., requires the Regenerative Thermal Oxidizer (RTO) maintain a minimum destruction efficiency of 95% (by weight). During a scheduled compliance test on October 18, 2022, preliminary test data was observed and indicated that the RTO was in violation of this permit condition, averaging a destruction efficiency of 92-93%. No official test data was recorded at this time.

Duration

The violation began on October 18, 2022 when test data was observed and indicated non-compliance. Following the implementation of the corrective actions detailed below, unofficial test data observed on November 7, 2022 indicated that the RTO was in compliance, maintaining an average destruction efficiency between 95 and 96%. Therefore, the total duration of the violation was 20 days.

Cause and Corrective Actions

On October 18, 2022 Lacks staff began consulting with Durr, an RTO specialist, regarding possible causes of the reduced destruction efficiency. Lacks contracted Durr and scheduled to have them on-site for troubleshooting and a thorough inspection of the unit on November 5 and 6, 2022. During this inspection, it was found that damper seals were worn, and the cylinders were not adjusted properly. This caused a gap to remain when the dampers were in the closed position, allowing emissions to escape instead of being burned off properly. All of the seals were replaced and the cylinders were shimmed to ensure a tight fit when the dampers are closed.

Unofficial test data observed with Network Environmental on November 7, 2022 verified that the actions taken on November 5 and 6 had returned the unit to compliance. An official compliance test was conducted on November 9, 2022. Data observed during this test also showed compliance with the 95% minimum destruction efficiency requirement. An official test report will be provided to EGLE once received by Lacks from Network Environmental.

In order to prevent reoccurrence of this violation, the Corporate Environmental Oversight Team and Paint West maintenance staff are working together to update the RTO preventative maintenance (PM) program. Updated PMs will include pictures that show maintenance staff issues to look out for when conducting the inspections. Once the PMs have been revised, the O&M Plan will be updated accordingly as necessary. Copies of the updated PMs will be provided to EGLE by Friday, December 2, 2022.

Please contact me if you have any questions.

Sincerely,

Karen Homrich

Karen Homrich
Environmental Manager
616.956.7259
k.homrich@lacksenterprises.com

cc: Ms. Jenine Camilleri, EGLE