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April 7, 2023

Robert Joseph
Dept. of Environment, Great Lakes, and Energy
27700 Donald Court
Warren, Michigan 48092-2793

Re: Collision Craftsmen
SRN N5600, Macomb County

Dear Mr. Joseph,

In response to your emails of April 4th and April 6th, I offer the following.

Items Number 1 and 2 will be addressed at the same time, as they are somewhat intertwined. It is my understanding that during your March 1, 2023 inspection, Collision did not produce a hard copy of any permit calculation sheets (aka Appendix B of permit number 148-06). That appears to be a violation of FG-Source Section VI of permit 148-06. Collision is adamant that PPG was responsible for keeping the necessary records required for compliance and PPG agreed to that. From the reports I have seen from PPG, it appears to have performed at least part of those tasks which would appear to confirm assumption of those duties. One would hope that a software program marketed to painters would have the ability to generate reports in the required format.

I have not had the opportunity to talk directly with PPG. I do not know if PPG's software generates reports in the required format or whether it even has the ability to do so. I plan to meet with the PPG representative to find out (discussed below). If PPG did not or cannot generate reports in the required format, I would agree with you that they do not exist. That would mean the violations occurred from the time Collision opened its doors in early January of 2019 through March 7, 2023, the date of the NOV. Assuming PPG does not have the appropriate reports, by way of explanation, the violations occurring from January 2019 to March 2023 were caused by Collision's belief that PPG was addressing all the requirements of permit 148-06 and Collision's failure to monitor PPG's compliance with the permit.

Responding to item number 3, Collision is trying to address the violations noted in the March 7, 2023 NOV. I have attached permit calculation sheets for February 2023 and March 2023. The March 2023 usage records are due April 15, 2023. I understand there have been a number of records sent to you in various formats that have been deemed unacceptable. I would deem the recordkeeping violations to be ongoing as there appears to be some confusion about the specific format required for any submitted records. I would like to converse with you as early as possible to clear up this confusion.

In response to number 4 & 5, moving forward, there is a big problem with communication between Collision and PPG that needs to be addressed. More importantly, Collision needs to become the captain of its own ship. I have requested proposals from two environmental consulting firms with air expertise. Collision now has received enough information from both consultants to choose one.

My goal is to have a meeting within the next 30 days between the consultant, Collision, PPG, and me. At that meeting, we will delve into the PPG VOC emissions program. We need to know what program outputs PPG's software can generate. Secondly, we need verification that the data in the columns on the reports we have been given (like "Actual VOC Applied") is correct by comparing it to the SDS VOC contents. Third, we need verification from PPG that its total VOC emissions include purge and cleanup operations. I confirmed with Collision this week that it does collect that data. We also need to verify that the program is calculating the VOC emissions with an EGLE acceptable method. Implicit in all this is the cooperation of PPG. Collision has indicated that if PPG does not cooperate, it will change paint suppliers and there appears to be one waiting in the wings to do so.

After the above meeting, I anticipate about a 30-day period in which the consultant will prepare a summary of its findings/recommendations. I believe that it will take another 60 days to implement those recommendations. That time period is not cast in stone as I do not fully know what recommendations will be included. I anticipate that potential recommendations will include preparation of an Excel spreadsheet(s) to track the monthly and 12-month rolling total VOC emissions. I foresee the possibility for some training for onsite personnel to use the spreadsheet correctly. I do not see that as a herculean task however and once the method is explained to staff, it should be relatively easy to implement. The above timeframes are estimates with the actual timeframes to be dictated by the consultant. In the meanwhile, I believe once confusion about the format for submittal is addressed, Collision will be in position to timely submit the month permit calculation sheets.

Respectfully,

/s/ Kevin A. Lavallo

Kevin A. Lavallo