

Via E-Mail

November 13, 2024

Ms. Michelle Luplow
Environmental Quality Analyst
Michigan Department of Environment, Great
Lakes and Energy
Air Quality Division
Constitution Hall
525 West Allegan Street
Lansing, MI 48909

Re: Granger Container Service

Dear Ms. Luplow:

I am writing on behalf of Granger Container Service (“GCS”), to the October 23, 2024 Violation Notice (“VN”) regarding the July 29, 2024 inspection. The VN covers two topics, each of which are addressed below.

- Actual gallons of paint used per month not being tracked. Purchase records used and averaged over several calendar months.

Response: Purchase records have been used to monitor paint usage since 2018. The maximum amount of paint purchased at any given time is 200 gallons and is not stored or accumulated in excess. These records verify that no more than 200 gallons of paint is used in any given month. Regardless, going forward, actual paint usage will be recorded monthly. GCS commenced monthly paint inventory measurements in August 2024 to facilitate monthly calculations.

- Particulate control system not properly installed.

Response: As stated in the VN, since 2016, Granger has made improvements to its paint booth particulate control system. This includes training, inspections, and posted signs that show installation of filters. The paint booth uses 20” x 20” filter frames. The filters used are purchased, designed, and sized to fit in the specific frame. The filters themselves stretch to fill the frames in

Ms. Michelle Luplow
November 13, 2024
Page 2

one direction. This horizontal pull and retraction of the filters is a result of the manufacturing of the filters and is not due to improper installation. There is no evidence that the installation of the filters is causing breakthrough of paint (which would be readily apparent). Therefore, GCS believes that the filters are functioning properly and have been properly installed. Regardless, GCS is evaluating alternate filters filter designs that do not retract or stretch.

I trust that this letter satisfactorily responds to the VN. Please let me know if you have any further questions or comments.

Sincerely,

HONIGMAN LLP

S. Lee Johnson

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Brad Myott, EGLE
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