



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

October 29, 2020

Mr. Jim Morrissey
Lacks Industries, Inc.
4375 52nd Street
Kentwood, Michigan 49512

SRN: N2079, Kent County

Dear Mr. Morrissey:

VIOLATION NOTICE

On August 27, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a notification pursuant to Rule 912, which indicated that an emission limit exceedance had occurred at Lacks Industries, Inc. located at 4375 52nd Street, Kentwood, Michigan. A review of this notification and subsequent written report received on September 22, 2020 as well as supporting information received on September 29, 2020, was conducted. The purpose of this review was to determine Lacks Industries, Inc.'s compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 110-18.

During the review, the following was noted:

Process Description	Rule/Permit Condition Violated	Comments
EUSPINELLE	PTI No. 110-18, FGCENTRALPAINT, Special Condition I.2	Hexavalent Chromium on the roof.

During a review of the Rule 912 report, and follow-up supporting information, the AQD learned that excessive air flow from an uncontrolled stack adjacent to the EUSPINELLE plating tank and scrubber control device pulled hexavalent chromium into the air stream, up the stack, and out onto the roof. The exhaust fan for this adjacent stack has been turned off, and the uncontrolled emissions of hexavalent chromium have discontinued. As such, no further response is necessary to this Violation Notice, unless the proposed corrective action plan is not continued as detailed.

If Lacks Industries, Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

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Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my review of Lacks Industries, Inc. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

April Lazzaro

April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Ms. Karen Baweja, Lacks
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE