



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

September 9, 2016

Ms. Karen Baweja, Supervisor of Air Quality
Lacks Enterprises, Inc.
4365 52nd Street, SE
Kentwood, Michigan 49512

SRN: N7374, Kent County

Dear Ms. Baweja:

VIOLATION NOTICE

On August 18, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, received emissions test data for Plastic Plate Kraft, 5675 Kraft Avenue in Cascade Township, Michigan. The report and test data were used to determine Plastic Plate Kraft'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 Renewable Operating Permit (ROP) No. MI-ROP-N7374-2015.

Based on the review of the company's records and test data, staff verified:

Process Description	Rule/Permit Condition Violated	Comments
Three chromic acid etch tanks, Stack SVK-2 (EUCHROMEETCH)	ROP No. MI-ROP-N7374-2015, EUCHROMEETCH, Special Condition I.1	Testing conducted on July 14, 2016 resulted in total chromium emissions from the etch tanks (SVK-2) at 0.023 mg/dscm which is above the 0.016 mg/dscm emission limit in the permit.
Three chromic acid etch tanks, Stack SVK-2 (EUCHROMEETCH)	ROP No. MI-ROP-N7374-2015, EUCHROMEETCH, Special Condition I.2	Testing conducted on July 14, 2016 resulted in total chromium emissions from the etch tanks (SVK-2) at 0.0045 lbs/hr which is above the 0.0032 lbs/hr emission limit in the permit.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 30, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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It is noted that additional stack testing of the chrome etch stack was conducted on August 26, 2016, and you indicated that preliminary data suggests compliance with the applicable chromium emission limits. Your response to the cited violations should also include a complete stack test report for the second round of testing of the process.

If Plastic Plate Kraft 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.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please call me at the number below.

Sincerely,



David L. Morgan
Environmental Quality Specialist
Air Quality Division
616-356-0009

cc: Ms. Heidi Hollenbach, DEQ
cc/via email: Mr. Jeff Cowdery, Plastic Plate Kraft
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Tom Hess, DEQ