



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

July 23, 2020

Mr. Jim Morrissey  
Plastic Plate Kraft  
5675 Kraft Avenue  
Cascade Township, Michigan 48064

SRN: N7374, Kent County

Dear Mr. Morrissey:

**VIOLATION NOTICE**

On July 8, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Plastic Plate Kraft located at 5675 Kraft Avenue, Cascade Township, Michigan. The purpose of this inspection was 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 the conditions of Renewable Operating Permit (ROP) number MI-ROP-N7374-2020.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCHROMEETCH	ROP No. MI-ROP-N7374-2020, EUCHROMEETCH, Special Condition III.2	Failure to utilize a chemical fume suppressant containing a wetting agent in quantities and frequency to meet the surface tension limit as established during stack testing.

During the records review portion of the inspection, it was determined that the surface tension limits of the hexavalent chrome etch tanks had been exceeded.

A new surface tension limit was set for Tank #2 and Tank #3 during the December 3, 2019 compliance stack testing. The surface tension limit for Tank #1 was set during the October 26, 2017 stack test. Results were made available to EGLE on January 15, 2020. Specifically, from January 15, 2020 through March 20, 2020 the following exceedances were identified:

- Tank #1- 9 times
- Tank #2- 113 times
- Tank #3- 4 times

Mr. Jim Morrissey  
Plastic Plate Kraft  
Page 2  
July 23, 2020

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 13, 2020 (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.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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 violation cited above and for the cooperation that was extended to me during my inspection of Plastic Plate Kraft. 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  
Senior Environmental Quality Analyst  
Air Quality Division  
616-558-1092

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