



November 30, 2021

Ms. April Lazzaro  
Michigan Department of Environment, Great Lakes, & Energy  
350 Ottawa, N.W.  
Grand Rapids, MI 49503

**Re: Lacks Airplane North – Violation Notice Written Response**

Ms. Lazzaro:

This letter is in response to the Violation Notice dated November 10, 2021 regarding the Lacks Enterprises, Inc. Airplane North facility. The violation was for failure to properly install, maintain and operation the composite mesh pad scrubber associated with the EUPN-10 chrome etch tanks.

**Duration**

The violation occurred on October 22, 2021 when the unit was inspected during a compliance stack testing event at the facility. The duration of the violation was approximately 32 days. This covers the length of time between the October 22, 2021 inspection and November 24, 2021 when repairs were completed. The violation is not ongoing.

**Cause and Corrective Actions**

The cause of the cited violation is general wear on the equipment due to age. Maintenance staff have continued to monitor the status of the unit over time and have escalated repairs from PVC to corseal in response to the changing effectiveness of previous repairs. During the October 22, 2021 inspection of the unit, EGLE and Lacks staff discussed the need to further escalate repairs. On November 24, 2021, maintenance staff repaired all of the previously identified areas of concern with a fiberglass resin and matting overlay. This repair method was also used as a preventative measure to address other areas that appeared to have potential of being weak points in the future. The fiberglass provides a more permanent repair and prevents additional small cracks and areas of concern from occurring. Once the fiberglass repairs were complete, the side of the scrubber body was repainted for monitoring purposes. This will allow maintenance staff to quickly identify potential future issues. Additionally, in the event that these

repairs prove to be unsuccessful, capital has been approved to replace the unit if this becomes necessary. A photograph of the completed repairs is attached to this letter.

Please contact me if you have any questions.

Sincerely,

*Karen Baweja*

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cc: Ms. Jenine Camilleri, EGLE