



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 14, 2020

Mr. Jim Morrissey
Lacks Enterprises, Inc.
4260 Airline Road SE
Kentwood, Michigan 49512

SRN: N0895, Kent County

Dear Mr. Morrissey:

VIOLATION NOTICE

On August 18 and 19, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Lacks Enterprises, Inc. located at 4260 Airline Road SE, Kentwood, Michigan. The purpose of this inspection was to determine Lacks Enterprises, 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 Renewable Operating Permit (ROP) number MI-ROP-N0895-2018a.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
North Plater- Three Hexavalent Decorative Chrome Plating Tanks (EUPN-12)	ROP No. MI-ROP-N0895-2018a, Special Condition (SC) III.3; Rule 910 and 40 CFR 63.342(f)	Failure to properly install, maintain and operate the composite mesh pad scrubber
North Plater- Three Hexavalent Chrome Etch Tanks (EUPN-10)	ROP No. MI-ROP-N0895-2018a, SC III.3 and Rule 910	Failure to properly install, maintain and operate the composite mesh pad scrubber
North Plater- Hexavalent Decorative Chrome Plating Tanks 1 & 3 (EUPN-12)	ROP No. MI-ROP-N0895-2018a, SC III.3 and III.5, and Rule 910	Failure to maintain surface tension below 45 dynes/cm

On August 18, 2020, the AQD staff observed operation of the hexavalent chrome and hexavalent chrome etch processes while the scrubbers were not operating properly due to disrepair. This constitutes a violation of ROP No. MI-ROP-N0895-2018a, EUPN-10 and 12, SC III.3 and Rule 910 of the administrative rules promulgated under Act 451,

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which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Pursuant to 40 CFR 63.342(f), the AQD finds that the existing Operation and Maintenance (O&M) Plan has failed to provide for the proper operation of the affected source in a manner consistent with good air pollution control practices. As such, the AQD is requesting that Lacks Enterprises, Inc. conduct the following:

Modify the existing O&M Plan to increase the frequency of inspections of the hexavalent chrome plating scrubber from quarterly to monthly. In addition to the increased frequency, Lacks will need to modify the plan to include a checklist that identifies individual components of the scrubber for inspection. The modified plan shall also include the requirement for generating visual documentation of each component of the unit, using photographic means. Using this method will support two things: 1) ensure the inspections are conducted thoroughly and completely and 2) provide evidence of the timeframe of any structural issues that may appear over time. The modified plan should also include a training module for all Lacks staff that are conducting the inspections of the control equipment. All documentation generated during the monthly O&M inspections shall be maintained on file for a minimum of five years and made available upon request. The modified plan shall be submitted to the AQD upon completion, but no later than October 31, 2020.

While the hexavalent chrome etch process is not subject to 40 CFR Part 63, the AQD is requesting the same modifications to the O&M Plan/Malfunction Abatement Plan for the scrubber associated with that process pursuant to Rule 911. The modified plan shall be submitted to the AQD upon completion, but no later than October 31, 2020.

Hexavalent decorative chrome plating tanks #1 and #3 combined exceeded the surface tension limit 14 times during January-June 2020. This is a violation of the permit and Rule 910. Lacks utilizes both fume suppressant and a composite mesh pad scrubber during stack testing to demonstrate compliance with the emission limit.

Finally, it was noted during the inspection that the rocks on the roof in the area surrounding EUPN-6, the electroless copper process, were exhibiting a green discoloration. In the response to this letter, please include the findings of Lacks Enterprises, Inc.'s investigation discussed during the inspection as to the cause of the discoloration.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 5, 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

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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 Lacks Enterprises, 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.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Lacks Enterprises, Inc. If you have any questions regarding the violations 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 Enterprises, Inc.
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE