



June 9, 2021

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

Re: Barden Plater – Violation Notice Written Response

Ms. Lazzaro:

This letter is in response to the Violation Notice dated April 28, 2021 regarding the Lacks Enterprises, Inc. Barden Plating facility. Violations included failing to properly maintain and operate the electroless copper packed bed scrubber, failing to conduct the annual inspection of the two mesh pad scrubbers and failing to maintain and operate the fan for the discharge from FGNEUTCATACC.

Duration

The duration of the failure to maintain the electroless copper packed bed scrubber was approximately 2 or 3 days. The unit had been thoroughly inspected the weekend prior to testing and no leaks had been observed at that time. The duration of the failure to conduct the annual inspection of the two mesh pad scrubbers was one year, annual inspections were conducted in 2019 and 2021. The duration of the failure to maintain and operate the fan for the discharge from FGNEUTCATACC is unclear. Previous inspections did not indicate there were any issues with the unit.

Cause and Corrective Actions

The water leaking from the electroless copper packed bed scrubber was caused by a stress crack in the main PVC scrubber housing. A tote was placed beneath the unit as an interim measure to capture the water and prevent it from migrating to a nearby roof drain. Repair could not occur immediately due to the weather conditions at the time. The capture tote remained in place until the weather warmed up and the unit could be properly repaired. These repairs occurred on May 15, 2021. The small leak from the exhaust stack rubber boot was repaired immediately using a higher quality rubberized material to create a proper seal. All other elements of the unit, including the fan, were in good condition and no other

repairs were required. This violation is not ongoing. In order to prevent reoccurrence, the scrubber PM will be updated to require a more thorough visual inspection of the unit, including underneath, and instructions to watch for certain signs like staining on the roof.

The annual inspections were not conducted on the two mesh pad scrubbers in 2020 due to effects of the COVID-19 pandemic. When the annual inspections of the mesh pad scrubbers at other Lacks facilities were conducted, the Barden Plating facility was shut-down due to a lack of work as a result of the pandemic. Before the facility started back up, a thorough quarterly inspection was conducted to verify that the units would start up properly. The only annual inspection activity that was not conducted was the removal of the covers to visually inspect the top of the mesh pads. The violation is not ongoing. The 2021 annual inspection was conducted on Saturday, April 10, 2021. In order to prevent reoccurrence, maintenance and engineering staff will set up reminders in their personal Outlook calendars as a backup notification to the current EAM PM generation.

At the time of the inspection, it was noted that the fan associated with FGNEUTCATACC was causing some vibration of the surrounding platforms. The fan belt was replaced and the vibration was reduced. On this device, fan amperage is monitored and measured, as required by the O&M Plan, to ensure that the unit is operating properly. Fan amperage was always maintained within the approved range meaning the blower was exhausting the necessary amount of air, meeting the O&M Plan and air modeling requirements. Although the vibration did not affect the performance of the unit, maintenance staff have been instructed to pay closer attention to belts and vibration when conducting their preventative maintenance checks.

Please contact me if you have any questions.

Sincerely,



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