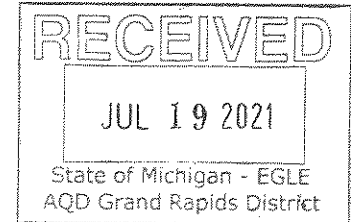




July 15, 2021

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 June 24, 2021 regarding the Lacks Enterprises, Inc. Barden Plating facility. Violations included exceeding the total chromium emission limits on the FGCHROME1 and FGCHROME2 units. FGCHROME1 has total chromium limits of 0.012 mg/dscfm and 0.0025 pph. Test results indicated total chromium emissions of 0.039 mg/dscfm and 0.0079 pph. FGCHROME2 has as total chromium limit of 0.005 mg/dscfm while test results indicated emissions of 0.006 mg/dscfm.

Duration

Based on test history of the units, the low level of production at the time of testing, and the thorough inspections that occurred when these results were received, Lacks believes there to be an error in the testing or analysis and, therefore, believes no violation has occurred.

Cause and Corrective Actions

When these results were confirmed by the analytical laboratory on Thursday, June 2, 2021, the plating line was shut down to allow time to inspect the exhaust units and investigate any potential causes of the exceedances. Both scrubber units were opened up and inspected for signs of chrome bypass. The mesh pads were inspected for signs of degradation and blowers were inspected for signs of staining or malfunction. Results of these inspections indicated there were no signs of chrome bypass or malfunction on either unit. All monitoring parameters were operating within their allowable ranges with no abnormal activity. Additionally, on Tuesday, June 29, 2021, ScrubAir Systems, Inc. was on-site and

also inspected both units. They observed no signs of chrome bypass and also believe there was an error in the testing.

Since we believe these results to be incorrect, Lacks has contracted a new test firm to perform a re-test on both units to verify the test results. Staff from CleanAir Engineering will be on-site to perform the testing on Tuesday, July 20, 2021. Lacks has requested an expedited turnaround time and will provide test results to EGLE as soon as they are available.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Karen Baweja". The signature is fluid and cursive, with the first name "Karen" and last name "Baweja" clearly legible.

Karen Baweja
Environmental Manager
616.956.7259
k.baweja@lacksenterprises.com

cc: Ms. Jenine Camilleri, EGLE