



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYHER
DIRECTOR

December 6, 2017

Mr. Steve Lovelace
Lawrence Industries, Inc.
423 Walbridge Street
Kalamazoo, Michigan 49007

SRN: N6981, Kalamazoo County

Dear Mr. Lovelace:

VIOLATION NOTICE

On November 21, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Lawrence Industries, Inc. (Facility), located at 423 Walbridge Street, Kalamazoo, Michigan. The purpose of this inspection was to determine the Facility'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); and the Air Pollution Control Rules.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Metal Electroplating	R 336.1285 (2)(r)(vii) (Rule 285)	See comment 1 below
	R 336.1201 (Rule 201)	See comment 2 below

Comment 1: The metal plating operations are done near open windows and doors, and there are some exhaust fans in the walls near the plating. This does not meet the Rule 285 exemption because these metal plating processes are not vented internally.

Comment 2: Because the metal plating process does not meet the Rule 285 exemption, a permit is required per Rule 201 of Act 451. The Facility does not have a permit and is, therefore, in violation of Rule 201.

The chrome plating process is also subject to the federal National Emission Standards for Hazardous Air Pollutants for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. These standards are found in 40 Code of Federal Regulations Part 63, Subpart N.

During this inspection, it was noted that the Facility had commenced operation of an unpermitted process at this Facility. The AQD staff advised the Facility on December 4, 2017, that this is a violation of Rule 201.

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A program for compliance may include a completed Permit to Install application for the metal electroplating process equipment. An application form is available by request or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right hand side of the page)

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 27, 2017 (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 recurrence.

If the Facility 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 the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Monica Brothers
Environmental Quality Analyst
Air Quality Division
269-567-3552

MB:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ