



November 1, 2017

Ms. April Lazzaro
Air Quality Division
Department of Environmental Quality
350 Ottawa, N.W.
Grand Rapids, MI 49503

Re: Kraft Plater – ROP No. MI-ROP-N7374-2015

Ms. Lazzaro:

This letter is in response to the Violation Notice dated October 13, 2017 regarding the Lacks Enterprises, Inc. Kraft Plating facility. The cited violation was for failing to meet the stack diameter requirements on the exhaust stacks associated with EUCONDITIONER and FGNEUTCATACC.

SEQUENCE OF EVENTS

The Kraft Plating facility initiated actions to obtain a Permit to Install for an additional catalyst tank in June of 2017. As necessary stack and process data were collected in order to apply for the permit, it was discovered that the diameter of the stack associated with the current catalyst tank was 48 inches. The permitted maximum diameter for the stack was 46 inches. At this time, the diameters of the remaining stacks were measured and compared to the permitted values. Initially, the stack associated with EUCONDITIONER was thought to have a larger diameter than its permitted limit as well. After these discrepancies were self-reported on the Semi-Annual ROP Report Certification in September, further investigation revealed that the Conditioner stack was not out of compliance. The diameter had been measured at the base of the stack and it was later discovered that the stack bottlenecks down to the appropriate diameter closer to the point of exhaust.

DURATION

The duration of the violation has been since the completion of construction and startup of trial operations in July of 2013.

CAUSE and CORRECTIVE ACTIONS

We believe the cause of the violation to be inadequate communication between our Environmental and Plant Engineering departments during the time of planning and permitting of the facility, prior to its construction.

We will be implementing a new check and balance system into our Capital Budget MER purchasing system, which will require a signoff from the Environmental and Plant Engineering departments prior to final approval of a project that involves or affects aspects of the environment. This will foster better communication between the Environmental and Plant Engineering departments to ensure that building plans and drawings match the permitted equipment in the future.

Additionally, correspondence will be distributed to our vendors stating that they cannot manufacture equipment without an approval signature from Lacks Enterprises for final build plans and drawings.

The violation is not ongoing. The Permit to Install for the additional catalyst tank was approved by the Michigan Department of Environmental Quality on October 31, 2017. This PTI includes a modification to the maximum diameter of the stack, which is now correct at 48 inches.

Please contact me directly if you have any questions or require additional information.

Sincerely,



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cc/via email: Jim Green
Jim Morrissey
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