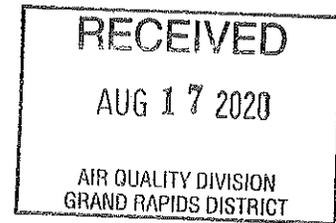




August 10, 2020

Ms. April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division - MDEGLE
350 Ottawa, N.W.
Grand Rapids, MI 49503



Re: Kraft Plater – MI-ROP-N7374-2020 Violation Notice Response

Ms. Lazzaro:

This letter is in response to the Violation Notice dated July 23, 2020 regarding the Lacks Enterprises, Inc. Plastic Plate Kraft facility. The violation is for failure to utilize a chemical fume suppressant containing a wetting agent in quantities and at a frequency to meet the surface tension limit as established during stack testing.

DURATION

A new surface tension limit for Tank #1 was not established following the October 26, 2017 compliance stack test until July 15, 2020. New surface tension limits for Tank #2 and Tank #3 were not established following the December 4, 2019 compliance stack test until July 15, 2020.

Except for during the December 3, 2019 test without the HEPA filter, the composite mesh pad scrubber, including the HEPA filter, were installed and operating properly. No emission limits were exceeded outside of the December 3, 2019 test. Emissions were verified to be in compliance again on December 4, 2019 with the HEPA filter installed.

CAUSE and CORRECTIVE ACTIONS

The root cause of the cited violation is that Lacks was mistakenly under the impression that the surface tension requirements listed in the permit were the same as the requirements of all of the other permitted chrome etch tanks within the organization. Additionally, as a proactive measure to reduce our overall use and discharge of PFAS constituents, Lacks has been attempting to limit the addition of PFAS

containing, although PFOS free, fume suppressants to the chrome etch tanks. While maintaining compliance with the limits is a top priority, this action raises the overall surface tension slightly, allowing less of a buffer between the measured surface tension and the limits.

The violation is not ongoing as the surface tension limits were promptly updated in the lab and the O&M Plan for each tank on July 15, 2020. Lacks is currently working with Fishbeck to submit a Permit to Install modification to remove the SC III. 2 from EUCHROMEETCH. In order to prevent a reoccurrence, the updated surface tension limits will remain in place until the next compliance stack test, at which time the limits would be updated, or the previously mentioned PTI is approved.

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

Sincerely,



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cc/via email: Ms. Jenine Camilleri, EGLE
Mr. Jim Morrissey, Lacks
Mr. Dan Jaracz, Lacks
Mr. Ken Bailey, Lacks
Mr. Jeff Cowdrey, Lacks