



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

July 15, 2015

Ms. Karen Baweja, Supervisor of Air Quality
Lacks Enterprises, Inc.
4365 52nd Street, SE
Kentwood, Michigan 49512

SRN: N7374, Kent County

Dear Ms. Baweja:

VIOLATION NOTICE

On July 6 and July 7, 2015, the Department of Environmental Quality (DEQ), Air Quality Division, received emissions test data for Plastic Plate Kraft, 5675 Kraft Avenue in Cascade Township, Michigan. The report and test data were used to determine Plastic Plate Kraft'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); the administrative rules; and Renewable Operating Permit (ROP) No. MI-ROP-N7374-2015.

Based on the review of the company's records and test data, staff verified:

| Process Description | Rule/Permit Condition Violated | Comments |
|---|--|--|
| Three chromic acid etch tanks, Stack SVK-2 (EUCHROMEETCH) | ROP No. MI-ROP-N7374-2015, EUCHROMEETCH, Special Condition I.1 | Testing conducted in May 2015 resulted in total chromium emissions from the etch tanks (SVK-2) at 0.017 mg/dscm which is above the 0.016 mg/dscm emission limit in the permit. Subsequent testing conducted in June 2015 resulted in total chromium emissions from the etch tanks at 0.025 mg/dscm which is also above the 0.016 mg/dscm emission limit in the permit. |
| Three chromic acid etch tanks, Stack SVK-2 (EUCHROMEETCH) | ROP No. MI-ROP-N7374-2015, EUCHROMEETCH, Special Condition I.2 | Testing conducted in May 2015 resulted in total chromium emissions from the etch tanks (SVK-2) at 0.0033 lbs/hr which is above the 0.0032 lbs/hr emission limit in the permit. Subsequent testing conducted in June 2015 resulted in total chromium emissions from the etch tanks at 0.0048 lbs/hr which is above the 0.0032 lbs/hr emission limit in the permit. |

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 5, 2015 (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 reoccurrence.

If Plastic Plate Kraft 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. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please call me at the number below.

Sincerely,



David L. Morgan
Environmental Quality Analyst
Air Quality Division
616-356-0009

cc: Ms. Heidi Hollenbach, DEQ
cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Tom Hess, DEQ
Mr. Dan Jaracz, Plastic Plate Kraft
Mr. Jeff Cowdery, Plastic Plate Kraft
Mr. Jim Morrissey, Plastic Plate
Mr. Jim Green, Lacks Enterprises