



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

April 28, 2021

Mr. Jim Morrissey  
Lacks Enterprises, Inc. – Barden Plater  
4375 52<sup>nd</sup> Street  
Kentwood, MI 49512

SRN: N2079, Kent County

Dear Mr. Morrissey:

VIOLATION NOTICE

On April 13-15, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Lacks Enterprises, Inc. – Barden Plater located at 4090 Barden Drive, SE, Kentwood, Michigan. The purpose of this inspection was to determine Lacks Barden Plater’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 Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N2079-2017.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUELECTROLESSCU	MI-ROP-N2079-2017, Section 2, EUELECTROLESSCU Special Condition IV.1 and Rule 910	Failure to properly maintain and operate the packed bed scrubber.
FGCHROME1	MI-ROP-N2079-2017, Section 2, FGCHROME 1 Special Condition III.1 and Rule 910	Failure to conduct the annual inspection of the composite mesh pad scrubber.
FGCHROME2	MI-ROP-N2079-2017, Section 2, FGCHROME1 Special Condition III.2 and Rule 910	Failure to conduct the annual inspection of the composite mesh pad scrubber.
FGNEUTCATACC	MI-ROP-N2079-2017, Section 2, FGNEUTCATACC Special Condition III.1	Failure to properly maintain and operate the fan for the discharge from FGNEUTCATACC.

On April 13-15, 2021, the AQD staff observed operation of EUELECTROLESSCU while the packed bed scrubber was not properly operating. A large tote had been placed underneath the scrubber to catch the water leaking from the bottom seal of the unit. Additionally, the fan was in disrepair, and water was leaking out of the rubber gasket on the exhaust stack. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law and of MI-ROP-N2079-2017.

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In the ROP Certification and Deviation Report, Lacks Enterprises, Inc. – Barden Plater identified that the annual internal inspection has not been conducted on the FGCHROME1 and FGCHROME2 composite mesh pad scrubbers since 2019. This is a violation of the ROP and Rule 910.

Excessive vibration was noted from the fan for FGNEUTCATACC. This is a violation of the ROP, FGNEUTCATACC, Special Condition III.1.

Also, during the inspection small liquid leaks were identified on both FGCHROME1 and FGCHROME2 composite mesh pad scrubbers. These leaks, and the condition of the units indicates poor maintenance of the control devices.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 19, 2021 (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.

Please submit the written response to EGLE, AQD, Grand Rapids District Office, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lacks Enterprises, Inc. – Barden Plater 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 Lacks Enterprises, Inc. – Barden Plater. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
616-558-1092

cc: Mr. Dave Cain, Lacks Industries  
Ms. Karen Baweja, Lacks Industries  
Ms. Mary Ann Dolehanty, EGLE (via email)  
Dr. Eduardo Olaguer, EGLE (via email)  
Ms. Jenine Camilleri, EGLE (via email)  
Mr. Christopher Ethridge, EGLE (via email)  
Ms. Heidi Hollenbach, EGLE (via email)