



October 27, 2021

Ms. April Lazzaro
Michigan Department of Environment, Great Lakes, & Energy
350 Ottawa, N.W.
Grand Rapids, MI 49503

Re: Plastic Plate Monroe – Violation Notice Written Response

Ms. Lazzaro:

This letter is in response to the Violation Notice dated October 8, 2021 regarding the Lacks Enterprises, Inc. Plastic Plate Monroe facility. The violation was for exceedances of the surface tension limit established in the Malfunction Abatement Plan for the chrome etch tank associated with EU-CHROME.

Duration

Records submitted following the inspection on August 24, 2021, indicated that the surface tension operating range of less than 55 dynes/cm was exceeded 24 times while the chrome etch tank was in operation during the period of January 1, 2020 and July 31, 2021. Upon further review, it was verified that only 22 of these exceedances occurred during times of production. The 2 readings from February 21 and 22, 2021 occurred during start up when there were no bars in the line. The list of violations along with approximate durations can be found attached to this letter. The attachment also shows corresponding scrubber pressure readings, all of which were within the operating limits indicating that the scrubber was operating properly and no emission limits are believed to have been exceeded.

Cause and Corrective Actions

On August 12, 2020, an automatic standard addition of etch wetting agent was instituted to help ensure the surface tension remained below the set value. Of the 22 exceedances, only 2 occurred following this change. There have been no additional exceedances since the one on May 14, 2021. This is a reduction from 20 violations in 8 months, to 2 violations in 14 months. In an effort to further reduce the chance of additional exceedances, the upper amber limit for the etch surface tension will be reduced from 50 to 45 dynes/cm. This will prompt lab personnel to adjust and re-check the surface tension sooner than at the

existing limit. All lab technicians have been re-trained to the existing surface tension work instruction (attached), and a monthly meeting to review surface tension trends with plant management has been initiated.

Furthermore, Plastic Plate Monroe will conduct stack testing of the chrome etch scrubber exhaust to ensure the performance of the air scrubbing equipment. The date of testing has yet to be determined but will be communicated to EGLE as per the listed guidelines.

Please contact me if you have any questions.

Sincerely,

Karen Baweja

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cc: Ms. Jenine Camilleri, EGLE