



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 8, 2021

Forou Zandeh  
Plastic Plate, Inc.  
1648 Monroe Avenue NW  
Grand Rapids, Michigan 49503

SRN: B6138, Kent County

Dear Forou Zandeh:

**VIOLATION NOTICE**

On August 24, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Plastic Plate, Inc., a Lacks Enterprises facility, located at 1648 Monroe Avenue NW, Grand Rapids, Michigan. The purpose of this inspection was to determine Plastic Plate, Inc.'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 Permit to Install (PTI) number 221-00C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-CHROME, Chrome Etch Tank	PTI No. 221-00C, FG-PLATINGLINE, Special Condition III.1 and Rule 911	Exceedance of surface tension limits established in the Malfunction Abatement Plan

A records review 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 2021. This is a violation of PTI No. 221-00C, FG-PLATINGLINE, Special Condition III.1 and Rule 911.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 29, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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, 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.

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Additionally, as part of the compliance program specified in the response to this Violation Notice, in accordance with Rule 1001 (R 336.2001) and General Condition 13 of PTI No. 221-00C, the AQD is requesting that Plastic Plate, Inc. conduct a stack test to demonstrate compliance with the total chromium emission limit established in PTI No. 221-00C and the limit established in 40 CFR Part 63, Subpart N. Please submit a test plan within 60 days of receipt of this letter. The plan shall include a proposed date for the testing, which is to be conducted no later than November 30, 2022. The test should determine the emission rate of total chromium from the scrubber. All testing must be conducted using United States Environmental Protection Agency approved test methods.

Not less than 7 days before the performance test is conducted, the AQD must be notified in writing of the time and place of the performance tests and who shall conduct them. Results of the performance test shall be submitted to the department in the format prescribed by the applicable reference test method within 60 days after the last date of the test. The results must include emissions reported in both pounds per hour (pph) and milligram per dry standard cubic meter (mg/dscm).

Copies of the test plan should be sent to the Department of Environment, Great Lakes, and Energy, Air Quality Division, Technical Programs Unit at P.O. Box 30260, Lansing, MI 48909-7760 and the Grand Rapids District Office at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503. If you have any questions about the requested performance test, please contact me at the number listed below.

If Plastic Plate, Inc. 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 violation cited above and for the cooperation that was extended to me during my inspection of Plastic Plate, Inc.. If you have any questions regarding the violation 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: Ms. Karen Baweja, Lacks Enterprises  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi Hollenbach, EGLE