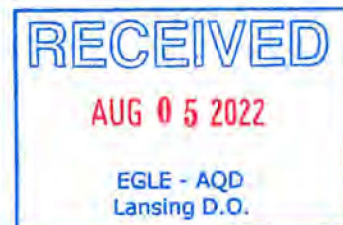




*Technologies for Better Surface Protection*



August 2, 2022

Mr. Daniel McGeen, Environmental Quality Analyst  
EGLE, Air Quality Division  
First Floor South  
P.O. Box 30242  
Lansing, MI 30242

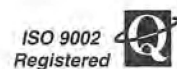
Dear Mr. McGeen:

This letter is in response to the Violation Notice dated June 27, 2022. Most of the violations were already responded to in various emails but I have responded to them again in this letter.

1. EUREACTOR 304 – The gauge on EUREACTOR304 was broken and had been taken off the condensate pot for replacement sometime between 3/31/22 and 4/13/22. Our records show that EUREACTOR304 was not in operation during this time the temperature gauge was taken out, the temperature gauge was replaced with a new one on or about 4/14/2022.
2. EUCALCIUM – There was an inoperable pressure gauge on the bin filter bag and that has now been replaced with a new one as shown in Figure 2. No records are available as to when the gauge became inoperable but it was replaced on or about 6/21/2022.
3. EUCALCIUM – As per #2 above, the inoperable pressure drop indicator gauge has been replaced with a new one on or about 6/21/2022. No records are available as to when the gauge became inoperable but it has been replaced now.
4. EUOXIDATION216 – EGLE AQD inspectors in the past have gone by the temperatures recorded on the charts for compliance. Temperatures are being recorded on the charts only for this specific compliance purposes. All of the temperature data on the charts show that Lockhart has been in compliance on the minimum temperature of 1400 F for the incinerator. During your visit, there was an LCD display that showed temperature 1390 F slightly below the 1400 F minimum. Joseph D. Boiler Maintenance Company was called into check the digital display and explain why it showed lower temperature than the temperatures on the chart recorder during your visit. Explanation was that the digital display is for the process controller to react and open/close the natural gas flowing into the incineration so that the incinerator does not get too hot and stay above 1400 F. The boiler technician has asked us to go with the temperatures recorded on the charts for the compliance as the process controller for gas valve is located independently of the chart recorder temperature gauges. Lockhart does not feel that it is in violation of the minimum temperature of 1400 F as shown on the chart recorders. So as not to leave any ambiguity and close the argument, the Boiler Company has elevated the set point on

*Lockhart Chemical Company*

4302 James P. Cole Boulevard • Flint, MI 48505 U.S.A.  
Phone (810) 789-8330 • FAX (810) 789-3266



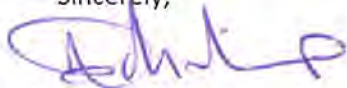
the process controller so that the temperature for the process controller is above the minimum 1400 F.

5. EUOXIDATION216 -The parts to fix the chart recorders that monitor and record the vent flow rate are not available. Joseph D. Boiler Company has been asked to replace the vent flow chart recorders with new alternative recorders. They have visited the oxidized thermal unit and are in the process of locating new chart recorders for the vent flow rates. We are requesting additional 90 days (Nov. 2, 2022) for Joseph Day Company to replace the chart recorders with new alternative to satisfy AQD requirements. In the meantime, the Operator has been asked to manually record the flow rate during the process once per batch as the flow rate does not change during the process.
6. EUOXIDATION216 – As per above in #5, new vent recorders are being sourced. In the meantime, Operator has been advised to manually record the vent flow rate on batch tickets.
7. FGLIME540-541 – A preventative maintenance program has been formally put in place. No records on the maintenance of the lime silo were kept. Moving forward, records will be available on the maintenance.
8. FGLIME540-541 – During the month of July, 2022, the bin vent filter on Tank 540 was opened, cleaned and general maintenance performed. As part of the general maintenance, a new motor on the bin vent filter was also installed. Maintenance verified that the bin vent filter is working properly.
9. Wear due to weather conditions may have resulted in part of the missing label on the 304 condenser pot. An audit on the process equipment labels was conducted on June 28. Deteriorated labels on all main process equipment specified in the Air Use Permit have been replaced with new ones.

Should you require additional information, please feel free to contact me any time via email [RMINHAS@Lockhartchem.com](mailto:RMINHAS@Lockhartchem.com).

Thank you for your assistance and cooperation.

Sincerely,

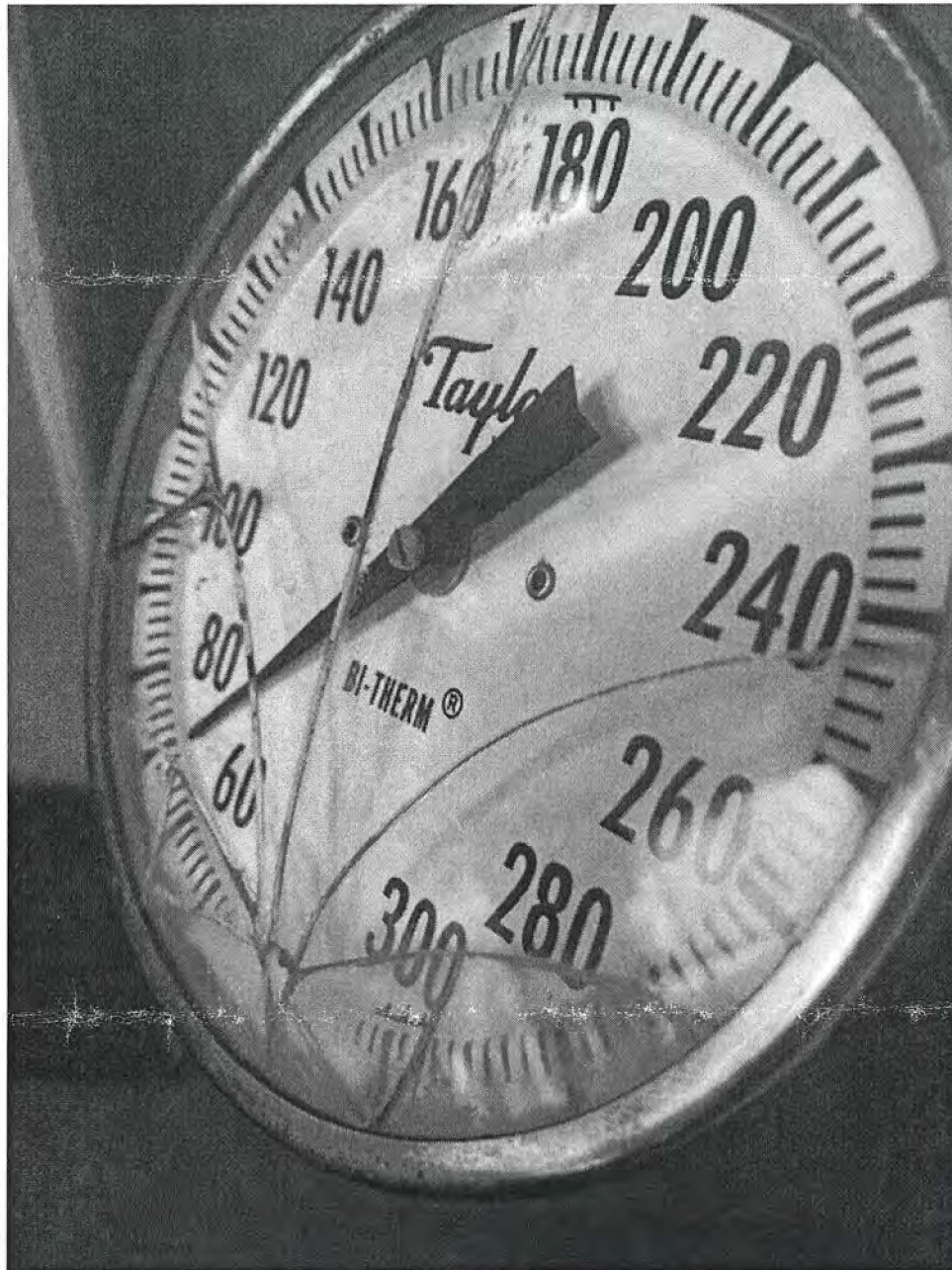


Raj Minhas, President

Lockhart Chemical Company.

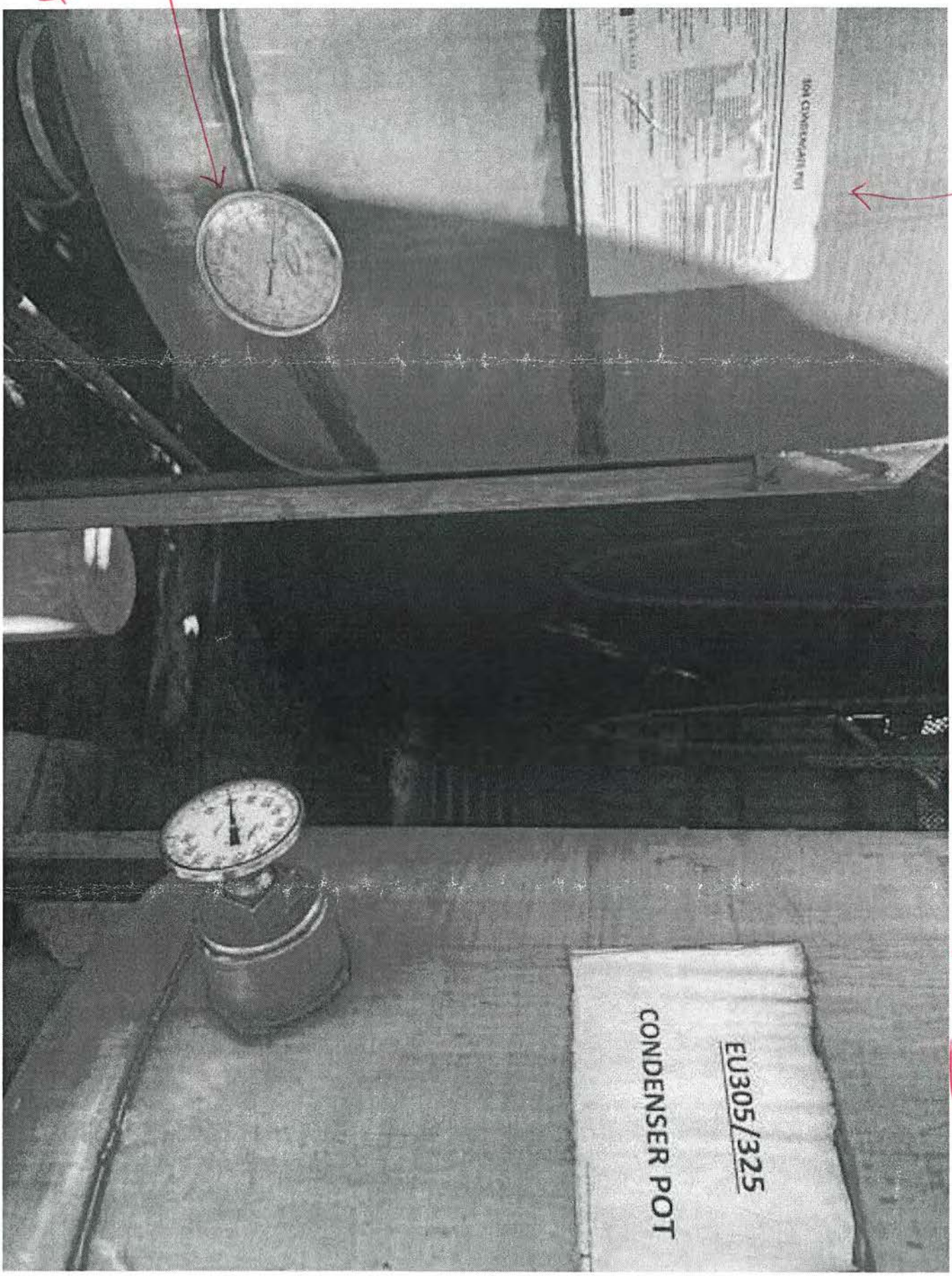
**Lockhart Chemical Company**

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Broken gauge on EU REACTOR 304  
that was missing from the 304 pot  
for repair/replacement. Figure 1

R-304  
new temp  
gauge on

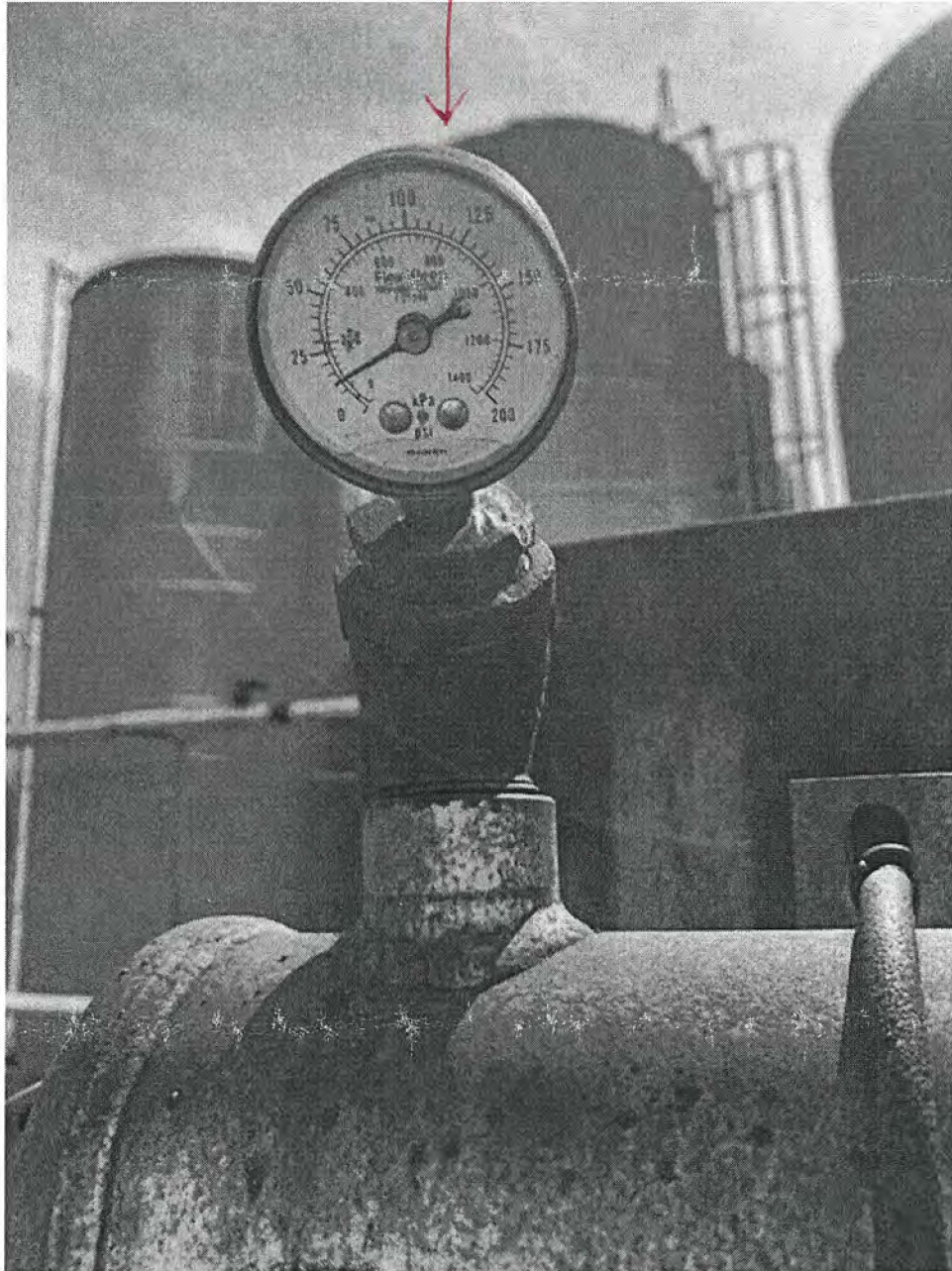


new label

Figure 1.1 - temp gauge on R-304 Pot AND new label

New Pressure gauge on EU CALCIUM

Figure 2



Operator manually writing down  
Airflow until parts or new  
equivalent chart recorders for  
Airflow are sourced.

