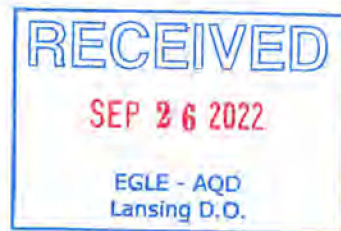




Technologies for Better Surface Protection

September 21, 2022

Mr. Daniel McGeen, Environmental Quality Analyst
EGLE, Air Quality Division
First Floor South
P.O. Box 30242
Lansing, MI 48909-7760



Dear Mr. McGeen:

This letter is in response to the Violation Notice dated August 18, 2022.

EUOxidation216: Although the Operator cannot remember the particular incidence of a sudden drop and rise in the temperature on the incinerator, the explanation received from the Operator of the unit is that a sudden drop & rise in temperature on the thermal incinerator is perhaps due to a power outage to the whole process. When the power to the process returns, the incinerator temperature returns to the normal temperature and the process is restarted. Operator of the EUOxidation216 unit has been informed to note down any abnormal condition in the future on the chart.

Under/Over Controller: Per the incinerator service company, the purpose of the under/over controller readout is to ensure that the incinerator temperature remains in the safe operating zone or a caution light or audible alarm will come up on the process control unit. This is to prevent damage to the thermal incinerator from overheating above a certain temperature. Under temperature is to alert the Operator that the incinerator temperature is below the set point after a specified time in the controller. The set points were readjusted again by the Joseph M Day on 7/28/22. Set points are for safety and alert issue and do not affect the actual operating temperature of the incinerator.

EUCALCIUM: Although there is no specification on the limit of pressure drop, the bag filter had been functional but the operator had not been writing down the Pressure Drop readings. Attached with this letter is a new procedure that requires the Operator to write down the pressure drop in the future. A new procedure to record pressure drop on the EUCALCIUM process has been implemented and attached with this letter.

Should you require additional information, please feel free to contact me any time via email RMINHAS@Lockhartchem.com.

Thank you for your assistance and cooperation.

Sincerely,

Raj Minhas, President

Lockhart Chemical Company.

Lockhart Chemical Company

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ISO 9002
Registered

EUCalcium:

Calcium Area CONDITIONS:

CA45 Production:

<u>Date</u>	<u>Reactor</u>	<u>Batch #</u>	<u>Batch Size</u> <u>(lbs)</u>	<u>Product</u>	<u>FILTER Bag must be</u> <u>on during powder</u> <u>dumping</u> <u>(YES/NO)</u>	<u>Pressure DROP on Bag FILTER</u> <u>during powder dumping</u> <u>(PSI)</u>