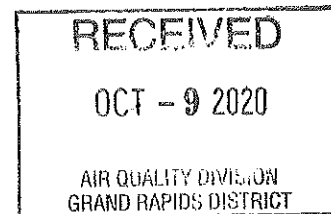




October 5, 2020

Ms. April Lazzaro
Air Quality Division
MDEGLE
350 Ottawa, N.W.
Grand Rapids, MI 49503



Re: Airplane North – Violation Notice Written Response

Ms. Lazzaro:

This letter is in response to the Violation Notice dated September 14, 2020 regarding the Lacks Enterprises, Inc. Airplane North Plating facility. The violation is for failing to properly maintain air-cleaning device equipment associated with EUPN-10, EUPN-12, and for failure to maintain surface tension below 45 dynes/cm in chrome plating tanks 1 and 3 associated with EUPN-12.

DURATION

The duration of the violations for failure to properly maintain the two composite mesh pad scrubber systems was less than 5 days. Both units had been thoroughly inspected the previous week, on August 13, 2020 and the cited violations were discovered and repaired during compliance testing on August 18, 2020.

With regard to the violation for failure to maintain surface tension below 45 dynes/cm, surface tension readings exceeding this limit were recorded on 14 occasions.

These violations are not ongoing.

CAUSE and CORRECTIVE ACTIONS

We believe the cracks in the seams of the scrubbers occurred due to the dramatic temperature swings that had been occurring. The cold nights and warm days caused the PVC material to expand and contract, resulting in the structural failures. The chrome etch scrubber was repaired immediately. The chrome plate scrubber was temporarily repaired right away using duct tape to seal the seam and allow the compliance test to resume. Permanent patch repair was completed the week of August 28.

In addition to making the scrubber repairs, our long term corrective action plan in order to prevent reoccurrence will include updating the existing O&M Plan to increase the frequency of inspections from quarterly to monthly and to include photographic documentation of inspections as required by the September 14, 2020 Violation Notice.

The surface tension exceedances on decorative chrome plating tanks 1 and 3 were caused by drag-out. In order to prevent additional occurrences, the add function for the tanks was increased, requiring larger adds to help ensure that the surface tension remains below 45 dynes/cm. There have been no additional readings over 45 recorded since the end of June.

ADDITIONAL FOLLOW-UP

During the inspection it was noted that some of the rocks on the roof surrounding the exhaust from the electroless copper process, EUPN-6, were exhibiting a green discoloration. Several of the rocks were taken from the roof and soaked in a dilute sulfuric acid solution and then the solution was analyzed using an ICP. The element with the highest concentration in the solution was copper. Therefore we believe that over time, exhaust from either the acid copper stack or the electroless copper stack has settled on the roof in the area surrounding the stack, giving the rocks the green discoloration.

Please contact me if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Baweja". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Karen Baweja
Environmental Manager
616-956-7259
k.baweja@lacksenterprises.com

cc/via email: Jim Morrissey
Steve Morrissey Jr.
Ken Bailey
Ben Seitz