



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

September 24, 2024

Jim Morissey
Lacks Enterprises, Inc.
4260 Airline Road SE
Kentwood, Michigan 49512

SRN: N0895, Kent County

Dear Jim Morissey:

VIOLATION NOTICE

On July 31 and August 1, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Lacks Enterprises, Inc. located at 4260 Airline Road SE, Kentwood, Michigan. The purpose of this inspection was to determine Lacks Enterprises, 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 Renewable Operating Permit (ROP) number MI-ROP-N0895-2024. While the compliance evaluation was in process, the AQD received an email notification on September 13, 2024, indicating that an emission limit exceedance had occurred.

During the review, the following was noted:

Process Description	Rule/Permit Condition Violated	Comments
EUPN-10, hexavalent chrome etch process	MI-ROP-N0895-2024, FGN-1, Special Condition I.2	Chrome emission limit exceedance following a foaming event in the evaporator.

During a review of information provided by Lacks Enterprises, Inc., including the Rule 912 emission limit exceedance notification, the AQD learned that the etch reclaim pump had failed and was replaced on July 18, 2024. A similar replacement pump was installed; however, the new pump flow was too high, which caused excessive chromium etch solution foaming in the evaporator. The chromium etch solution traveled into and through the mesh pad scrubber and was emitted into the air and onto the roof for a period of up to 94 hours, though the actual time is unknown.

Following discovery of the foaming event, the correct sized pump was installed, the chrome etch scrubber was cleaned, and the HEPA filters were replaced. Additionally, stack testing was conducted on August 31, 2024, and results are pending. As part of

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the follow up to the pump flow issues, Lack's Enterprises, Inc. intends to add a flow rate meter to the unit, which will be tied into the existing process controls monitoring software with setpoint ranges and alarms. If an alarm or set point is reached in the future, the pump will be shut down and an alarm will sound. This will also be incorporated into the O & M Plan, following receipt of the stack test results. As such, no further response is necessary to the Violation Notice, unless the proposed corrective action plan is not implemented as detailed.

If Lacks Enterprises, 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 Lacks Enterprises, 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: Karen Homrich, Lacks Enterprises, Inc.
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE