



WMA
DEQ-AQD LANSING D.O.

MAY 04 2016

4/25/2016

Nathan Hude
Environmental Quality Analyst
Lansing District Office-AQD
525 West Allegan Street
P.O Box 30242
Lansing, MI 48909-7742

Dear Mr. Hude,

This is Lapeer Plating and Plastics written response to the Violation Notice recently received in regards to your inspection on March 22nd, 2016.

MACE, TO

Violation #.)

1.) FG-COATING- Booth filter was removed while paint operations were occurring.

- This violation occurred because a single paint booth operator was temporarily not following the rules/ requirements for his position, although he and all paint technicians know their dry filters/curtain wall must be installed, maintained and operated in a satisfactory manner. We hammered this requirement in after it occurred during last year's inspection, and we hadn't had, or noticed, any issues with anyone doing this since then (the Env. Coord had been doing weekly walkthroughs and never saw a single filter pulled out of place this whole time over the past year). The date(s) this occurred was just the day of the inspection, March 22nd, 2016, and the duration was for about an hour to three hours tops. This violation is not ongoing, and has not been since the moment the inspection took place. This employee was written up and given disciplinary actions. To prevent this from reoccurring again, we had meetings with all three paint shifts and their supervisors going over our permit, the Consent Order, and really pushing the environmental importance and reason of having the filters in place. We also discussed the potential fines (and trouble/discipline they'll face here... i.e. getting fired) associated with this requirement. We are doing all of this with any new hires as well. Also, the paint supervisors are doing daily walkthroughs for each shift, and the Environmental Coordinator is doing weekly audits/ walkthroughs at a minimum to ensure this never happens again and will prevent any chance of a reoccurrence. If any things are missing from the Env. Coord.'s audits then he will speak with that employee's supervisor and they will be written up and severe disciplinary actions will be taken.

2.) EU-CHROMEPLATE32- Malfunction Abatement Plan (MAP) has not been updated to current practices.

- The dates this occurred can be figured out after we discuss the violation and how/why it occurred. I (Kenneth Smith) don't know where the violation date should start and am hoping we (LP&P and the DEQ) can work with each other on this one as there was a major misunderstanding. This violation was caused at last year's Consent Order meeting in Lansing where Larry and myself (Ken Smith- Env. Coord.) came out and spoke with Jason Wolf (Enforcement), Jeff Rathbun (Permit Engineer), and yourself (Nathan Hude- Inspector). We all went over the Consent Order and it was asked if we had any questions or concerns. I, Kenneth Smith- Environmental Coordinator, immediately spoke out and asked for an extension on Consent Order- ADQ No. 27-2015 paragraph 9.a. regarding the due date set for the EU-CHROMEPLATE32 and EU-CHROMEETCH MAP to be updated/completed by, as I was already stressed about how soon the date was set for, swamped and behind on work dealing with all the violations, and I also stated how I had never worked on a MAP before and definitely needed more time than what was set in the Consent Order to get it completed. After I said this, your DEQ team quickly talked and responded saying that LP&P needed to make modifications to our Permit and that the MAP due date on the

Consent Order would be set on hold/aside until after the new Modified PTI was put into place, and then to base the MAP off the new PTI and its modifications. The Consent Order was signed by both parties after the MAP due date in the Consent Order, so I think that gives a little light and shows this was actually discussed and part of the agreement, although it was only discussed verbally (wish we would have put it in writing now, but didn't think we would any issue). Hoping you can be understanding and work with us on this violation and possibly pass on any fines related to this, as it was an honest misunderstanding. We were told to follow the existing MAP, which we were doing, until the Permit Modifications and new MAP were set into place. The Permit Modifications were/ are about finished (these just took longer than expected due to waiting on getting information back and forth to each other, Jeff Rathbun and myself, regarding Emission Limits and the initial testing that set these limits), we just have few final edits to discuss and need to set a final meeting in Lansing with Jeff to go over everything and submit the Permit Mod's at that time (just letting you know this is extremely close to completed). The current inspection and related violations have taken precedent over that though, as I am now being instructed by Nathan Hude to complete the MAP first and before the PTI Modifications. Nathan Hude knows where I am at on the MAP. We have been in contact with each other, I recently sent him a draft version and he responded with notes/comments that I am currently incorporating into the MAP. I am hoping to have it done at the latest by the end of this work week, so by April 29th, 2016. Once this MAP is completed and put is put into place, all associated employees will be trained on what it contains and what their role is. It will be kept up-to-date and be a top priority for the Environmental Coordinator. This will ensure there's no reoccurrence along with the Environmental Coordinator having an audit list making sure he checks the MAP for any needed changes/updates bi-weekly.

We're are hoping the fines associated with this violation and the previous one can be greatly reduced and/or combined into one, as we feel we're getting double charged for this violation because the previous one is essentially the exact same violation, causes, duration, etc. We can discuss all this in our meeting.

3.) EU-CHROMEETCH- Malfunction Abatement Plan (MAP) has not been updated to current practices (same as above/Violation #2).

- The dates this occurred can be figured out after we discuss the violation and how/why it occurred. I (Kenneth Smith) don't know where the violation date should start and am hoping we (LP&P and the DEQ) can work with each other on this one as there was a major misunderstanding. This violation was caused at last year's Consent Order meeting in Lansing where Larry and myself (Ken Smith- Env. Coord.) came out and spoke with Jason Wolf (Enforcement), Jeff Rathbun (Permit Engineer), and yourself (Nathan Hude- Inspector). We all went over the Consent Order and it was asked if we had any questions or concerns. I, Kenneth Smith- Environmental Coordinator, immediately spoke out and asked for an extension on Consent Order- ADQ No. 27-2015 paragraph 9.a. regarding the due date set for the EU-CHROMEPLATE32 and

EU-CHROMEETCH MAP to be updated/completed by, as I was already stressed about how soon the date was set for, swamped and behind on work dealing with all the violations, and I also stated how I had never worked on a MAP before and definitely needed more time than what was set in the Consent Order to get it completed. After I said this, your DEQ team quickly talked and responded saying that LP&P needed to make modifications to our Permit and that the MAP due date on the Consent Order would be set on hold/aside until after the new Modified PTI was put into place, and then to base the MAP off the new PTI and its modifications. The Consent Order was signed by both parties after the MAP due date in the Consent Order, so I think that gives a little light and shows this was actually discussed and part of the agreement, although it was only discussed verbally (wish we would have put it in writing now, but didn't think we would have an issue). Hoping you can be understanding and work with us on this violation and possibly pass on any fines related to this, as it was an honest misunderstanding. We were told to follow the existing MAP, which we were doing, until the Permit Modifications and new MAP were set into place. The Permit Modifications were/ are about finished (these just took longer than expected due to waiting on getting information back and forth to each other, Jeff Rathbun and myself, regarding Emission Limits and the initial testing that set these limits), we just have few final edits to discuss and need to set a final meeting in Lansing with Jeff to go over everything and submit the Permit Mod's at that time (just letting you know this is extremely close to completed). The current inspection and related violations have taken precedent over that though, as I am now being instructed by Nathan Hude to complete the MAP first and before the PTI Modifications. Nathan Hude knows where I am at on the MAP. We have been in contact with each other, I recently sent him a draft version and he responded with notes/comments that I am currently incorporating into the MAP. I am hoping to have it done at the latest by the end of this work week, so by April 29th, 2016. Once this MAP is completed and put into place, all associated employees will be trained on what it contains and what their role is. It will be kept up-to-date and be a top priority for the Environmental Coordinator. This will ensure there's no reoccurrence along with the Environmental Coordinator having an audit list making sure he checks the MAP for any needed changes/updates bi-weekly.

We're are hoping the fines associated with this violation and the next one can be greatly reduced and/or combined into one, as we feel we're getting double charged for this violation because the next one is essentially the exact same violation, causes, duration, etc. We can discuss this in our upcoming meeting.

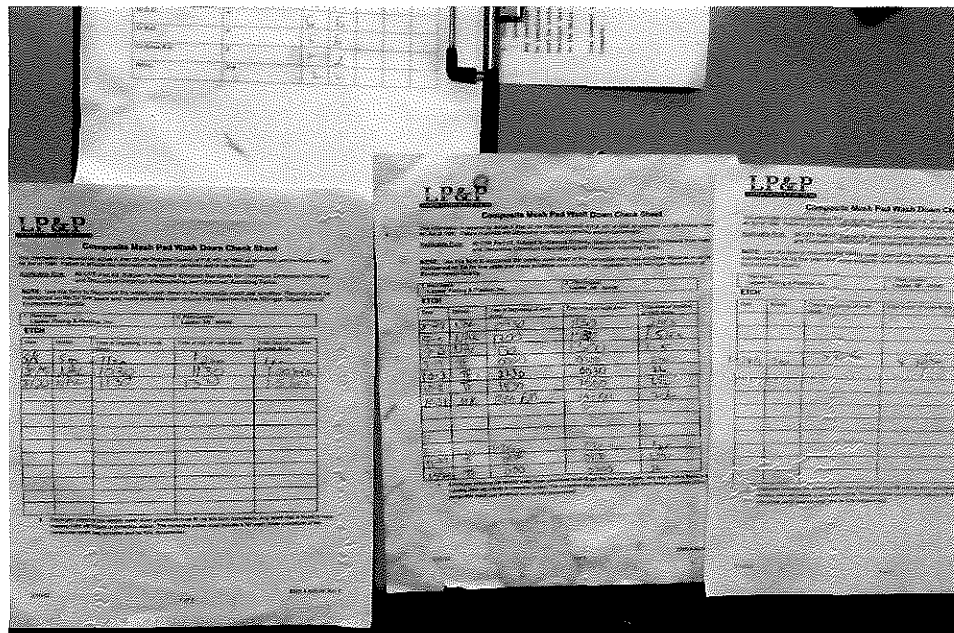
4.) EU-CHROMEPLAT32- CMP Wash-downs not being recorded properly, missing dates.

- The violation occurred between the dates of November 7th, 2015 and December 20th, 2015. This makes the violation duration 6 weeks. This violation was simply caused by our WWT operators not filling out the records. They had done every Wash-down but just forgot to fill out certain dates on the form/record when they finished. They never miss, or forget, doing the actual Wash-downs, it's part of their

weekend/shutdown procedure they must do every time, they just simply forgot to fill in the paperwork. This violation is not ongoing. The duration of not filling out the paperwork was six weeks but the duration of not doing Wash-downs was zero days. The WWT operators have been written up and disciplined. To ensure this is done and no reoccurrences happen, the Environmental Coordinator will be doing weekly audits to make sure these were done each week and the record has been filled in properly. Also, if any things are missing from the Environmental Coordinator's audits he will speak with that employee's supervisor and they will be written up and severe disciplinary actions taken.

5.) EU-CHROMEETCH CMP- Wash-downs not being recorded properly, missing dates.

This violation, like the one above, was simply caused by our WWT operators not filling out the records. They had done the Wash-down procedures for EU-CHROMEETCH every weekend, but for reason just forgot to fill out some of dates. They never miss or forget doing the actual Wash-downs, it's part of their mandatory weekend/shutdown procedure(s), they just simply forgot to fill in the paperwork after completing the Wash-downs. The violation notice has it stating that we only had one record (or check sheet) with one date on it for EU-CHROMEETCH CMP Wash-downs. We actually had three sheets with a total of 14 dates recorded between 8-8-2015 and 1-24-2016 (the dates recorded are 8/8, 8/15, 8/22, 8/29, 9/5, 9/12, 9/19, 10/3, 10/11, 10/31, 11/15, 11/29, 12/20, and 1/24/16... Pictures of CMP Wash-down records/ Check Sheets attached below). This would put the violation duration of not filling out the records (but still doing the actual Wash-downs) around 10 or 12 weeks. This violation is not ongoing. The WWT operators have been written up and disciplined accordingly. To ensure this is done and no reoccurrences happen, the Environmental Coordinator will be doing weekly audits to make sure these were done each week and the record has been completed properly and on time. If any things are missing from the Environmental Coordinator's audits then he will speak with that employee's supervisor and they will be written up and severe disciplinary action will be taken.



LP&P
Lapeer Plating & Plastics, Inc.

Composite Mesh Pad Wash Down Check Sheet

This information is required by Article II, Part 66 (Air Pollution Control) of P.A. 481 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in penalties under enforcement.

Applicable Rule: 40 CFR Part 63, Subpart N—National Emission Standards for Chromium Emissions from Heat and Decorative Chromium Electroplating and Chromium Anodizing Tanks.

NOTE: Use this form to document the weekly wash down of the composite mesh pad scrubber. Records must be maintained on file for five years and made available upon request for inspection by the Michigan Department of Environmental Quality.

1. Plant Name
Lapeer Plating & Plastics, Inc.

2. Plant Location
Lapeer, MI 48446

ETCH

Date	Initials	Time at beginning of wash down	Time at end of wash down	Total time of completed wash down
8/8	Sm	11:00	12:00	1 hr
8/15	NHL	10:30	11:30	1:00 hrs
8/22	NHL	11:30	13:30	1:5 hrs

1. Employee initiating the weekly wash down procedure must fill out this form completely. Any week that is missed or missing data will initiate a corrective action. The corrective action must include a full wash down procedure of the composite mesh pad scrubber and be fully documented.

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1. Plant Name
Lapeer Plating & Plastics, Inc.

2. Plant Location
Lapeer, MI 48446

ETCH

Date	Initials	Time at beginning of wash down	Time at end of wash down	Total time of completed wash down
8-29	NHL	07:30	11:30	2 hrs
9-5	NHL	12:00	15:00	1.5 hrs
9-12	NHL	15:00	15:00	1.5
9-19	TE	00:00	02:00	2 hr
10-3	TE	22:30	00:30	1 hr
10-10	TE	18:30	20:00	1.5 hr
10-31	TE	04:00	10:00	2 hr
11-7	TE	17:00	17:00	1 hr
11-14	TE	05:00	07:00	1.5 hr
11-20	TE	00:00	02:00	2 hr

1. Employee initiating the weekly wash down procedure must fill out this form completely. Any week that is missed or missing data will initiate a corrective action. The corrective action must include a full wash down procedure of the composite mesh pad scrubber and be fully documented.

(Pictures of Etch Wash-down records)

Composite Mesh Pad Wash Down Check Sheet

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1. Plant Name
Lapeer Plating & Plastics, Inc.

2. Plant Location
Lapeer, MI 48446

ETCH

Date	Initials	Time at beginning of wash down	Time at end of wash down	Total time of completed wash down
11-24-11	Sm	7:30 am	8:30 am	1 hr

1. Employee initiating the weekly wash down procedure must fill out this form completely. Any week that is missed or missing data will initiate a corrective action. The corrective action must include a full wash down procedure of the composite mesh pad scrubber and be fully documented.

6.) FG-FACILITY- Individual HAP emissions are not being tracked or recorded.

- The duration of this violation has essentially been accumulating since PTI-25-13 was finalized, signed, and put into place on April 25th, 2013, so that'd put the duration of this violation at approximately two years. However, this violation was caused by a combination of our last Environmental Coordinator leaving as PTI 25-13 (which he championed and switched us over to, and he was the only employee here that knew the exact details of what still needed to still be completed for us to comply with our new PTI... he left without sharing this information unfortunately) was being adopted, and also partially caused by our last DEQ-AQD Inspector, Brian Culham, as he came out multiple times and didn't even ask or bring up the HAP's database, and none of us noticed it at last year's Consent Order meeting either. From the bit of information the Environmental Coordinator could find on our server referring to this original PTI submission, LP&P showed the DEQ-AQD our System Output and Compliance Summary Reports from our ROP database for the year of 2012 (as this was the last full year of records prior to the PTI submission) as our way of tracking our HAP's and they (DEQ-AQD) seemed to be fine with it at that point in time. I know, after looking into HAP's tracking and fully understanding our Permit, that these reports are not satisfactory and do not track the HAP's emissions the way the Permit requires. We are hoping that since we are fixing this issue ASAP and it was caused by lack of professionalism on both sides (LP&P's and the DEQ's) that the fines can be greatly reduced and/or combined into one, as we feel we're getting double charged for this violation because the next one is essentially the exact same violation, causes, duration, etc.

We have contacted a third party to come out and set up our HAP's emission tracking database. They know this project is urgent and must be completed as soon as possible. The third party creating the database is EnGAGE. They're who set up and maintain our Plating computer system(s)/database(s) (including tracking our fume suppression data for both the Chrome and Etch tanks). This violation is currently ongoing, but won't be for much longer. It's scheduled to be completed ASAP. The date by which these corrective actions (HAP's database will be set up & running- done by EnGAGE) will take place and be completed is within three weeks, so by May 18th, 2016.

7.) FG-FACILITY- Aggregate HAP emissions are not being tracked or recorded.

- The duration of this violation has essentially been accumulating since PTI-25-13 was finalized, signed, and put into place on April 25th, 2013, do that'd put the duration of this violation at two years. However, this violation was caused by a combination of our last Environmental Coordinator leaving as PTI 25-13 (which he championed and switched us over to, and he was the only employee here that knew the exact details of

what still needed to still be completed for us to comply with our new PTI... he left without sharing this information unfortunately) was being adopted, and also partially caused by our last DEQ-AQD Inspector, Brian Culham, as he came out multiple times and didn't even ask or bring up the HAP's database, and none of us noticed it at last year's Consent Order meeting either. From the bit of information the Environmental Coordinator could find on our server referring to this original PTI submission, LP&P showed the DEQ-AQD our System Output and Compliance Summary Reports from our ROP database for the year of 2012 (as this was the last full year of records prior to the PTI submission) as your way of tracking our HAPS. I know, after looking into HAP's tracking and fully understanding our Permit, that these reports are not satisfactory and do not track the HAP's emissions the way the Permit requires. We are hoping that since we are fixing this issue ASAP and it was caused by lack of professionalism on both sides (LP&P's and the DEQ's) that the fines can be greatly reduced and combined, as we feel we're getting double charged for this violation because the previous one was essentially the exact same violation, causes, duration, etc.

We have contacted a third party to come out and set up our HAP's emission tracking database. They know this project is urgent and must be completed as soon as possible. The third party creating the database is EnGAGE. They're who set up and maintain our Plating computer system(s)/database(s) (including tracking our fume suppression data for both the Chrome and Etch tanks). This violation is currently ongoing, but won't be for much longer. It's scheduled to be completed ASAP. The date by which these corrective actions (HAP's database will be set up & running- done by EnGAGE) will take place and be completed is within three weeks, so by May 18th, 2016.

Please contact me if you have any question or concerns.

Sincerely,

Kenneth Smith

Kenneth Smith

Environmental Coordinator

Lapeer Plating and Plastics Inc.

810-667-4240 x1161