



**LAWRENCE INDUSTRIES, INC.**

**423 WALBRIDGE STREET**

**KALAMAZOO, MI. 49007**

**PHONE (269) 552-4999**

**FAX (269) 552-4989**

February 5, 2018

Ms. Monica Brothers  
Environmental Quality Analyst  
Air Quality Division  
MDEQ Kalamazoo District Office  
7953 Adobe Road  
Kalamazoo, MI 49009-5026



Re: Response to Notice of Violation Letter  
Lawrence Industries, Inc., Kalamazoo, Michigan (SRN No. N6981)

Dear Ms. Brothers:

This letter is in response to your Notice of Violation (NOV) dated December 6, 2017. The NOV alleges that the metal plating operations do not meet the Rule 285(2)(r)(vii) Permit To Install (PTI) requirements because the operations are performed near open windows and doors, and because there are exhaust fans in the walls near the plating. As described below, Lawrence Industries, Inc. (Lawrence) has historically worked with the MDEQ inspectors to comply with applicable permit requirements.

Prior to installation of the plating line, we submitted a PTI Application and PTI No. 130-01 was issued. The initial PTI Application included a hexavalent electroplating line. We ended up utilizing trivalent chromium in the electroplating line, instead of the more toxic hexavalent chromium. The facility commenced operation of the process in February 2002. In March of 2002, the facility was inspected by the MDEQ. Following the inspection, the MDEQ sent a letter informing me that the permit was no longer necessary, because each of the three electroplating lines meet the exemption requirements specified in Rule 285(r)(vii). A copy of the letter documenting the exemption and a copy of the activity report from the inspection are attached.

The facility had a second MDEQ inspection in January 2014. The results of the 2014 inspection agreed with the previous inspection and stated that the plating operations are exempt per Rule 285(r)(vii). A copy of the activity report from the second inspection is also attached.

The facility has not changed operations, nor has the facility installed any additional doors, windows, or exhaust fans since the previous inspections. In addition, although the numbering of the applicable exemption has changed in the rules, the requirements of the exemption have not changed. Therefore, Lawrence does not agree that this installation constitutes a violation. Lawrence has reasonably believed that its processes, which have not changed, continue to be compliant with applicable requirements, as confirmed by the Air Quality Division in 2002 and 2014.

Although Lawrence does not agree with the cited violation, we have contracted with FTCH to review and evaluate the exemption and permitting options best suited to this process. Lawrence will provide the results of this review by February 9, 2018.

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If you have any questions or require additional information, please contact me at 260-552-4999.

Sincerely,

LAWRENCE INDUSTRIES, INC.

A handwritten signature in black ink that reads "Steve Lovelace". The signature is written in a cursive style with a large initial "S".

Steve Lovelace

Owner

Attachments

By email and UPS – confirmation of delivery required

cc/att: Mr. Ron Baylor - Miller, Canfield, Paddock & Stone

Ms. Lynn M. Spurr – FTCH