



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

October 13, 2017

Mr. Dan Jaracz
Lacks Enterprises, Inc. - Plastic Plate Kraft
5675 Kraft Avenue
Grand Rapids, Michigan 49546

SRN: N7374, Kent County

Dear Mr. Jaracz:

VIOLATION NOTICE

On September 14, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a review of the Semi-Annual Renewable Operating Permit (ROP) Report Certification submitted by Lacks Enterprises, Inc. - Plastic Plate Kraft located at 5675 Kraft Avenue, Grand Rapids, Michigan. The purpose of this review was to determine Lacks Enterprises, Inc. - Plastic Plate Kraft'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 ROP number MI-ROP-N7374-2015.

During the review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCONDITIONER	ROP No. MI-ROP-N7374-2015, Special Condition VIII.1	Failure to meet the stack diameter requirements
FGNEUTCATACC	ROP No. MI-ROP-N7374-2015, Special Condition VIII.1	Failure to meet the stack diameter requirements

In the Semi-Annual ROP Report Certification, Lacks Enterprises, Inc. - Plastic Plate Kraft self-reported that the stack heights for EUCONDITIONER and FGNEUTCATACC are larger in diameter than permitted. This is a violation of the permit conditions. It is noted that the corrective action identified was to submit a Permit to Install application to modify the stack heights. A program for compliance may include a completed PTI application for the process equipment; however, as of the date of this letter, no application has been received.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 3, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the

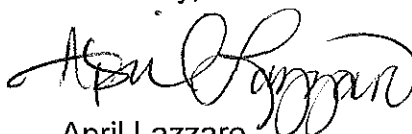
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violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Lacks Enterprises, Inc. - Plastic Plate Kraft 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 violations cited above and for the cooperation that was extended to me during my inspection of Lacks Enterprises, Inc. - Plastic Plate Kraft. If you have any questions regarding the violations 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
616-356-0248

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Karen Baweja, Lacks Enterprises, Inc.
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ