



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

November 10, 2021

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

SRN: N0895, Kent County

Dear Mr. Morrissey:

VIOLATION NOTICE

On October 22, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of process controls at the Lacks Enterprises, Inc. Airline (Lacks Airline) facility located at 4260 Airline Road SE, Kentwood, Michigan. The purpose of this inspection was to determine Lacks Airline'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-N0895-2018a.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
North Plater- Three Hexavalent Chrome Etch Tanks (EUPN-10)	ROP No. MI-ROP-N0895-2018a, FGN-1, SC III.1; Rule 910	Failure to properly install, maintain and operate the composite mesh pad scrubber.

In response to a 2020 Violation Notice, Lacks Airline updated the Operation and Maintenance Plan at the request of the AQD to include more frequent inspections to demonstrate that the composite mesh pad scrubbers were being properly maintained. In May 2021, an AQD compliance inspection found the scrubber to be in acceptable condition.

On October 22, 2021, the AQD staff observed operation of the hexavalent chromium etch process while the scrubber was not properly operating due to disrepair. This constitutes a violation of ROP No. MI-ROP-N0895-2018a, FGN-1, SC III.1 and Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 1, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AOD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AOD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lacks Airplane 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 Airplane. 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: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olague, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE