

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Lacks Industries, Inc.	SRN : N2079
Location : 4375 52ND STREET SE	District : Grand Rapids
	County : KENT
City : KENTWOOD State: MI Zip Code : 49512	Compliance Status : Compliance
Source Class : MAJOR	Staff : April Lazzaro
FCE Begin Date : 9/20/2016	FCE Completion Date : 9/20/2017
Comments : Unannounced, scheduled inspection.	

List of Partial Compliance Evaluations :

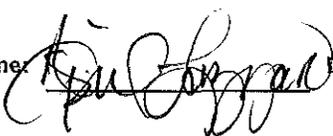
Activity Date	Activity Type	Compliance Status	Comments
09/20/2017	Stack Test	Unknown	RTO VOC Destruction Efficiency Test Reports. Review by TPU not conducted at this time.
09/20/2017	ROP Other	Compliance	Paint West Robotic Spray Booth Air Flow Test Report
09/20/2017	Stack Test	Unknown	Compliance Emissions Testing Report. Review by TPU not conducted at this time.
09/20/2017	MACT (Part 63)	Compliance	Semiannual Compliance for Subpart N
09/20/2017	Stack Test	Unknown	Compliance Emissions Testing for Condition (B1) Stack. Review by TPU not conducted at this time.
09/20/2017	ROP Semi 1 Cert	Compliance	All deviations have been properly addressed. Further discussion of AQD evaluation in 2017 FCE report.
09/20/2017	CAM monitor downtime	Compliance	No monitor downtime reported.
09/20/2017	CAM Excursions/Exceedances	Compliance	Four excursions occurred, with two listed by job number on 4/10/17. Appropriate action taken.
09/20/2017	MACT (Part 63)	Compliance	Semiannual Compliance for Subpart PPPP. No deviations reported.
09/20/2017	ROP Semi 1 Cert	Compliance	No deviations reported.
09/20/2017	MACT (Part 63)	Compliance	Semiannual Compliance for Chrome. No deviations reported.
08/08/2017	Scheduled Inspection	Compliance	Unannounced, scheduled inspection.

Activity Date	Activity Type	Compliance Status	Comments
07/18/2017	Stack Test Observation	Compliance	Observation of EUCONDITIONER stack test.
06/22/2017	ROP Annual Cert	Compliance	No deviations reported.
06/22/2017	ROP Semi 1 Cert	Compliance	No deviations reported.
06/22/2017	MACT (Part 63)	Compliance	Ongoing Compliance for Chrome-no deviations reported.
06/22/2017	MACT (Part 63)	Compliance	Company reports compliance with Subpart PPPP. Semiannual Compliance for Subpart PPPP
06/22/2017	CAM Excursions/Exceedances	Compliance	During 2016 the RTO on FGWESTROBOPAINT was having issues with flameouts. As of the stack testing conducted on 4/25/17, Lacks staff told me it was completely fixed with new equipment. This will be reevaluated if it continues, as it may no longer be considered a malfunction.
06/22/2017	CAM monitor downtime	Compliance	CAM downtime was reported as the chart slipped off the pen. This lasted 3.5 days, however there is a digital display and alarm if temperature drops. There were reportedly no alarms, and Lacks states the temperature did not drop.
06/22/2017	ROP SEMI 2 CERT	Compliance	During 2016 the RTO on FGWESTROBOPAINT was having issues with flameouts. As of the stack testing conducted on 4/25/17, Lacks staff told me it was completely fixed with new equipment. This will be reevaluated if it continues, as it may no longer be considered a malfunction.
06/22/2017	ROP Annual Cert	Compliance	During 2016 the RTO on FGWESTROBOPAINT was having issues with flameouts. As of the stack testing conducted on 4/25/17, Lacks staff told me it was completely fixed with new equipment. This will be reevaluated if it continues, as it may no longer be considered a malfunction.
06/12/2017	ROP Tech Review Notes	Compliance	ROP Technical Review Notes.
05/22/2017	Stack Test Observation	Compliance	Stack test observations that occurred 5/22-5/24.

Activity Date	Activity Type	Compliance Status	Comments
04/25/2017	Stack Test Observation	Compliance	RTO testing of oxidizers at Paint West (4/26/17) and Paint East (4/27/17).
04/14/2017	MAERS	Compliance	No significant changes in reported emissions. This facility should be reporting chrome emissions as a hazardous air pollutant, but since it's only recommended they report there's no way to enforce it.
03/07/2017	ROP Other	Compliance	Paint West Robotic Spray Booth Air Flow Test Report
03/07/2017	MACT (Part 63)	Compliance	Ongoing Compliance for Subpart N. Company lists 0.01 instead of 0.007 mg/dscm for the emission limit, but other information indicates compliance.
03/07/2017	ROP Other	Compliance	Paint West Robotic Spray Booth Air Flow Test Report
12/05/2016	Other	Unknown	Site visit related to PTI application No. 157-16.
12/05/2016	Site Review	Compliance	Smoke tube test observation at FGWESTROBOPAINT.
11/29/2016	MACT (Part 63)	Compliance	Ongoing compliance status report for Chrome
11/29/2016	CAM monitor downtime	Compliance	Two reports of chart slipping off center pin.
11/29/2016	MACT (Part 63)	Compliance	Semiannual Compliance for Subpart PPPP. Ongoing issue with regenerative thermal oxidizer on FGWESTROBOPAINT. Will be looked into during next FCE.
10/12/2016	MACT (Part 63)	Compliance	Semiannual Compliance with Subpart N
09/30/2016	ROP Annual Cert	Compliance	All documentation provided with original Responsible Official signature.

Activity Date	Activity Type	Compliance Status	Comments
09/30/2016	ROP SEMI 2 CERT	Compliance	For FGEASTPAINT there was 1 deviation reported for RTO temperature below 1,400 degrees F. All spraying was shutdown and there were no emissions exceedances. There was also a deviation reported for the manual booths not having electrostatic spray guns, which was previously cited. FGWESTROBOPAINT there were 13 deviations reported for RTO temperature below 1,400 degrees F. All spraying was shutdown and there were no emissions exceedances. There were also 1 deviation for RTO temperature chart recorder failure. Chart was corrected.
09/30/2016	CAM Excursions/Exceedances	Compliance	There was 1 CAM excursions for FGEASTPAINT and 12 CAM excursions for FGWESTROBOPAINT where the RTO temp. was less than 1,400 degrees F. No air emission exceedances; paint line shut-down automatically.
09/30/2016	CAM monitor downtime	Compliance	There was 1 instance of monitor downtime during the reporting period. 8/9-8/10/2015: FGWESTROBOPAINT, chart slipped off center pin. Replaced. RTO operated properly
09/30/2016	MACT (Part 63)	Compliance	Semiannual Ongoing Compliance Status for Subpart PPPP. No deviations during the reporting period.
09/30/2016	ROP SEMI 2 CERT	Compliance	During the certification period, there were no reported deviations for Section 2
09/30/2016	ROP Annual Cert	Compliance	All documentation provided with original Responsible Official signature.

Name:



Date:

9-21-17

Supervisor:

