## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

## **FCE Summary Report**

Facility: LACKS INDUSTRIES INC	SRN: N0895
Location: 4260 AIRLANE SE	District: Grand Rapids
	County: KENT
	ompliance Compliance atus :
Source Class: MAJOR	Staff: David Morgan
<u> </u>	FCE Completion 1/24/2014 Date :
Comments:	

## List of Partial Compliance Evaluations:

Activity Date	Activity Type	Compliance Status	Comments
01/24/2014	Stack Test	Compliance	Required stack test under Permit No. MI-ROP-N0895-2012 for various pollutants from the Airlane North Plater. All test results in compliance with applicable limits. Nickel emissions [SVN-1A & SVN-2A] = \$\mathbb{Q}\$.0.0057 lb/hr (0.0598 lb/hr limit), Formaldehyde [SVN-4] = 0.052 lb/hr, (2.72 lb/hr limit), Methanol [SVN-4] = 4.95 lb/hr (8.25 lb/hr limit), DCP [SVN-7] = 0.143 lb/hr (0.84 lb/hr limit).
01/10/2014	Stack Test	Compliance	Required stack test under Permit No. MI-ROP-N0895-2012 for chromium emissions from the chrome etch, chrome plate, and chrome plating tank 4 at Airlane South. All test results are in compliance with applicable limits. EUCHROME4 = 6.65E-05 lb/hr (5.0E-04 limit) and 8.0E-04 mg/dscm (0.01 mg./dscm limit); Chrome Etch = 4.915E-05 lb/hr (5.42E-04 limit); Chrome Plate = 1.23E-04 lb/hr (4.89E-04 limit) and 1.5E-03 mg/dscm (0.01 mg/dscm limit). Average pressure drop for the chrome etch scrubber = 5.0"H2O; for the chrome 4 scrubber =3.18"H2O; for chrome plate = 2.27"H2O. This establishes new operating ranges +/- 2 inches of water for each of these scrubbers. Surface tension for all below 39 dynes/cm.

Activity Date	Activity Type	Compliance Status	Comments
01/02/2014	MACT (Part 63)	Compliance	Ongoing Compliance Report under 40 CFR Part 63, Subpart N (North and South Platers). Certification by responsible official submitted on 8/23/2013. Total plating time for the North Plater for the reporting period was 3,527 hours. Total plating time for the South Plater for the reporting period was 3,503 hours. Composite meshpads had a pressure drop within +/- 2 inches of the acceptable value. O&M procedures were followed.
11/05/2013	Scheduled Inspection	Compliance	
06/13/2013	ROP Annual Cert	Compliance	The company certified compliance with an original responsible official signature. Deviations were reported in the first semi-annual reports.
06/13/2013	ROP SEMI 2 CERT	Compliance	No deviations were reported during the period from July 1 2012 through December 31, 2012.
06/13/2013	MACT (Part 63)	Compliance	Ongoing Compliance Report under 40 CFR Part 63, Subpart N (North and South Platers). Certification by responsible official submitted on 2/7/2013. Total plating time for the North Plater for the reporting period was 3,202 hours. Total plating time for the South Plater for the reporting period was 3,116 hours. Composite meshpads had a pressure drop within +/- 2 inches of the acceptable value. O&M procedures were followed.
11/09/2012	MACT (Part 63)	Compliance	Ongoing Compliance Status Report for 40 CFR 60, Subpart N (for North and South Platers). Certification by responsible official submitted on 8/30/2012. Total plating time for the North Plater for the reporting period was 3,286 hours. Total plating time for the South Plater for the reporting period was 3,283 hours. Composite meshpads had a pressure drop within +/- 2 inches of the acceptable value. O&M procedures were followed.

Activity Date	Activity Type	Compliance Status	Comments
11/09/2012	ROP Semi 1 Cert	Compliance	For ROP No. MI-ROP-N0895- 2007, the company had the following deviations:
			FGNESHAP, III.2 - For newly installed chrome plating tank 4 and associated composite mesh pad scrubber, the company did not record the pressure differential on a daily basis from November 28, 2011 to December 23, 2011. This was result of human error. It is noted that the pressure differential was monitored by the automated system and no fault alarms were detected. No violation is warranted because the company had other means of determining that the scrubber was operating properly. The company has corrected the recordkeeping issue through worker training. The deviations was adequately addressed.
11/05/2012	Stack Test	Compliance	Required stack test under Permit No. MI-ROP-N0895-2012 for chromium emissions from the chrome etch and new chrome plating tanks at Airlane North. All test results are in compliance with applicable limits. EUPN-12 (chrome plate) = 4.26E-05 lb/hr (4.3E-04 limit) and 4.51E-04 mg/dscm (0.01 mg./dscm limit); EUPN-10 (chrome etch) = 8.54E-05 lb/hr (3.7E-04 limit). Average pressure drop for the chrome etch scrubber was 4.54 inches of water and for the chrome plate scrubber and was 2.0 inches of water. This establishes new operating ranges +/- 2 inches of water for each of these scrubbers.
			The avg, production bar count for the chrome plate tanks was 67 bars; the avg, bar count for chrome etch was 59.

Name: Date: 1/2/ Supervisor: Ab
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