

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
City : KENTWOOD State: MI Zip Code : 49512	Compliance Status : Compliance
Source Class : MAJOR	Staff : April Lazzaro
FCE Begin Date : 9/8/2021	FCE Completion Date : 9/8/2022
Comments : Full Compliance Evaluation	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/08/2022	MACT (Part 63)	Compliance	Semiannual Ongoing Compliance Status Report for 40 CFR 64 Subpart N - Airlane South. Airlane South has not operated during the compliance period.
08/09/2022	On-site Inspection	Compliance	Unannounced, scheduled inspection.
05/31/2022	MACT (Part 63)	Compliance	Ongoing compliance status report for subpart N - Airlane North. Email received 2/10/22, hardcopy received 2/15/22. Lacks reports compliance with Subpart N, based on scrubber pressure drop readings. However, they have been informed that going forward, both surface tension and pressure drop are the compliance demonstration method. This is clarified based on language contained in NESHAP N that says if testing has not been conducted without a surfactant, it is assumed that both the scrubber and surfactant are required to meet the emission limit. There were two exceedances of the scrubber pressure drop requirements, both were "high" readings that are due to recent ductwork changes post-test parameter establishment. A VN will not be sent for the 2 occurrences.

Activity Date	Activity Type	Compliance Status	Comments
05/31/2022	MACT (Part 63)		Ongoing compliance status report for subpart N - Airlane South, email received 2/10/22 hardcopy received 2/15/22. Airlane South did not operate during the reporting period.
05/11/2022	MAERS	Compliance	Report certification with Supplemental Control Template submittal certification received on 3/21/22 (postmarked 3/17/22). 5/10/22 - questioned material t-put since it is "up" >700%. Asked company to investigate and get back to me. (this has been an issue in the past) 5/11/2022 - received updated material t-put- correct value is 209,668 gallons.
03/31/2022	ROP SEMI 2 CERT	Compliance	Postmarked 3/17/22. The deviations identified in the report do not require further action. However, due to the delay in conducting testing on the chrome scrubber if the unit is non-compliant a VN will be needed for the pressure drop readings being out of range due to the evaporator replacement. Testing was conducted in August 2022, instead of April 2022 as originally planned.
03/31/2022	ROP Annual Cert	Compliance	Postmarked 3/17/22. The deviations identified in the report do not require further action. However, due to the delay in conducting testing on the chrome scrubber if the unit is non-compliant a VN will be needed for the pressure drop readings being out of range due to the evaporator replacement. Testing was conducted in August 2022, instead of April 2022 as originally planned.
12/08/2021	Stack Test	Compliance	Compliance emissions testing report for the nickel and electroless copper stacks. (EUPN-6, stack SNV-4 which is an electroless nickel plating process that is controlled by a scrubber and EUPN-1, EUPN-2 and EUPN-3, stacks SVN-1A and SVN-1B which are uncontrolled) Test results indicate compliance with permit limits pending TPU methodology validation.

Activity Date	Activity Type	Compliance Status	Comments
11/24/2021	ROP Semi 1 Cert	Compliance	Two deviations are related to testing requirements for the Airlane South facility. This facility has been shut down and as such testing cannot be conducted. One deviation of the surface tension limit in the O&M Plan was identified. Due to the low (1) occurrence, the fact that it was 2 dynes/cm over the limit and the scrubber was functioning properly, this will not be cited as a violation at this time.
10/22/2021	Stack Test Observation	Non Compliance	Details of observations while onsite for testing on the nickel scrubber and uncontrolled nickel stacks.

Name: April Lazzaro Date: 09/08/2022 Supervisor: HH