

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 : Non Compliance
Source Class : MAJOR	Staff : David Morgan
FCE Begin Date : 9/1/14	FCE Completion Date : 9/25/2015
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/15/2015	Scheduled Inspection	Non Compliance	
09/11/2015	MACT (Part 63)	Compliance	Ongoing Compliance Status Report for 40 CFR Part 63, Subpart N for the Barden Plater. No deviations were reported. O&M procedures were followed. Total operating time for each of three plating tanks was 2,985 hours. Daily pressure drop records show pressure drop between 1.72" and 5.72" of water.
09/11/2015	ROP Semi 1 Cert	Compliance	For FGEASTPAINT there were 3 deviations reported for RTO temperature below 1,400 degrees F and 2 deviations for RTO temperature chart recorder failure. Company will need to resubmit due to spray gun violation found during inspection (See Activity Report No. N207931233) For FGWESTROBOPAINT there were 8 deviations reported for RTO temperature below 1,400 degrees F and 1 deviation for RTO temperature chart recorder failure.
09/11/2015	MACT (Part 63)	Compliance	Semiannual Compliance report for 40 CFR Part 63, Subpart PPPP.

David Morgan 9/30/15

PAB

Activity Date	Activity Type	Compliance Status	Comments
09/11/2015	CAM Excursions/Exceedances	Compliance	<p>There were three CAM excursions for FGEASTPAINT where the RTO temp. was less than 1,400 degrees F. No air emission exceedances; paint line shut-down automatically.</p> <p>There were eight CAM excursions for FGWESTROBOPAINT where the RTO temp. was less than 1,400 degrees F. No air emission exceedances; paint line shut-down automatically.</p>
09/11/2015	CAM monitor downtime	Compliance	<p>There were three instances of monitor downtime during the reporting period. 2/18-20/2015: FGWESTROBOPAINT, chart slipped off center pin. 36 hrs down. Fixed. RTO operated properly.</p> <p>2/23/2015: FGEASTPAINT, chart pen malfunction, 6 hrs down. Replaced. RTO operated properly</p> <p>6/25-26/2015: FGEASTPAINT, chart slipped off center pin, 30 hrs down. Fixed. RTO operated properly.</p>
09/11/2015	ROP Other	Compliance	<p>On April 22, 2015, a smoke tube test to determine air flow into the paint booth was conducted on the Paint East coating line at Lacks Enterprises located at 4375 52nd Street in Kentwood. The testing is required on an annual basis under ROP No. MI-ROP-N2079-2012. A report was submitted which documents the findings of the the test (see file). Based on the test results, the company has verified that air flow at each natural draft opening is going into the booths. The company is complying with the applicable ROP requirements.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/11/2015	ROP Other	Compliance	On June 22, 2015, a smoke tube test to determine air flow into the paint booth was conducted on the Paint West coating line at Lacks Enterprises located at 4375 52nd Street in Kentwood. The testing is required on a semi-annual basis under ROP No. MI-ROP-N2079-2012. A report was submitted which documents the findings of the the test (see file). Based on the test results, the company has verified that air flow at each natural draft opening is going into the booths. The company is complying with the applicable ROP requirements.
09/11/2015	MACT (Part 63)	Compliance	Ongoing Compliance Status Report for 40 CFR Part 63, Subpart N for the Barden Plater. No deviations were reported. O&M procedures were followed. Total operating time for each of three plating tanks was 2,788 hours. Daily pressure drop records show pressure drop between 1.72" and 5.72" of water.
09/11/2015	MAERS	Compliance	This MAERS is acceptable. -DLM
09/11/2015	ROP Annual Cert	Compliance	All documentation provided with original Responsible Official signature.
09/11/2015	ROP Annual Cert	Compliance	All documentation provided with original Responsible Official signature.
09/11/2015	ROP SEMI 2 CERT	Compliance	<p>For FGEASTPAINT there were 3 deviations reported for RTO temperature below 1,400 degrees F. All spraying was shutdown and there were no emissions exceedances. There was also 1 deviation for RTO temperature chart recorder failure. Chart paper was repositioned.</p> <p>FGWESTROBOPAINT there were 6 deviations reported for RTO temperature below 1,400 degrees F. All spraying was shutdown and there were no emissions exceedances. There were also 3 deviations for RTO temperature chart recorder failure. Chart pen was replaced.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/11/2015	ROP SEMI 2 CERT	Compliance	During the reporting period, the company reported 2 deviations under MI-ROP-N2079-2012 for the Barden Plater. The deviations were for surface tension exceedances on FGCHROME1 (chrome etch tanks) which exceeded 45 dynes/cm due to the drag-out rate being higher than the wetting agent addition rate. The company increased the amount of wetting agent and retested with results compliant.
09/11/2015	CAM Excursions/Exceedances	Compliance	For FGEASTPAINT there were 3 deviations reported for RTO temperature below 1,400 degrees F. All spraying was shutdown and there were no emissions exceedances. FGWESTROBOPAINT there were 6 deviations reported for RTO temperature below 1,400 degrees F. All spraying was shutdown and there were no emissions exceedances.
09/11/2015	CAM monitor downtime	Compliance	For FGEASTPAINT there was 1 deviation for RTO temperature chart recorder failure. Chart paper was repositioned. FGWESTROBOPAINT there were 3 deviations for RTO temperature chart recorder failure. Chart pen was replaced.
09/11/2015	MACT (Part 63)	Compliance	Semiannual Compliance with Subpart PPPP

Activity Date	Activity Type	Compliance Status	Comments
07/09/2015	Stack Test	Compliance	Compliance Emission Testing - Certification received 7/6/2015. Required Stack Test under Permit No. MI-ROP-N2079-2012 for chromium emissions from EUCHROME and EUETCH was conducted on 7/2/2015 at the Barden plating facility. All results are compliant with permitted limits. EUCHROME (chrome plate) = 0.0010 mg/dscm (0.005 mg/dscm limit) and 0.00015 lb/hr (0.0025 lb/hr limit). EUETCH = 0.0010 mg/dscm (0.005 mg/dscm limit) and 0.00019 lb/hr (0.0006 lb/hr limit). The average pressure drop was 3.32 inches of water for EUCHROME and 3.55 inches of water for EUETCH. There was an average of 73 bars per two hour run for each line.
03/13/2015	ROP Other	Compliance	On December 18, 2014, a smoke tube test to determine air flow into the paint booth was conducted on the Paint West coating line at Lacks Enterprises located at 4375 52nd Street in Kentwood. The testing is required on a semi-annual basis under ROP No. MI-ROP-N2079-2012. A report was submitted which documents the findings of the the test (see file). Based on the test results, the company has verified that air flow at each natural draft opening is going into the booths. The company is complying with the applicable ROP requirements.
10/23/2014	ROP Other	Compliance	RTO Low Temperature Shut Down Tests Report. The company demonstrated that when the temperature of the RTO fell below the minimum permit limit of 1,400 degrees F, the robotic spray lines at both the Paint East and Paint West facilities are shutdown. Once shutdown, the lines are interlocked so that spraying can not continue until the RTO temperature is above 1,400 degrees F.
10/23/2014	MACT (Part 63)	Compliance	Ongoing Compliance Status Report for 40 CFR Part 60, Subpart N for the Barden Plater. No deviations were reported. O&M procedures were followed.

Activity Date	Activity Type	Compliance Status	Comments
09/30/2014	ROP Semi 1 Cert	Compliance	See Compliance Activity Report No. N207927369. Original Responsible Official signature.
09/30/2014	MACT (Part 63)	Compliance	Semiannual for Subpart PPPP. See Compliance Activity Report No. N207927369.
09/30/2014	CAM Excursions/Exceedances	Compliance	See Compliance Activity Report No. N207927369.
09/30/2014	CAM monitor downtime	Compliance	See Compliance Activity Report No. N207927369.
09/30/2014	ROP Semi 1 Cert	Compliance	See Compliance Activity Report No. N207927369.
09/30/2014	MACT (Part 63)	Compliance	Semiannual for Subpart N (Chrome)
09/30/2014	Other	Compliance	ROP Certification Report, CAM Reports, MACT Ongoing Compliance Status Report Review

Name: _____ Date: _____ Supervisor: _____